

# Exhibit B

to Plaintiff's Motion for Final Approval of Settlement

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8 **UNITED STATES DISTRICT COURT**  
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

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

12 Plaintiff,

13 v.

14 FACEBOOK, INC.,

15 Defendant.

Case No: 3:18-cv-05982 WHA

**DECLARATION OF STEVEN  
WEISBROT RE: CLASS NOTICE  
PROGRAM**

16  
17 I, Steven Weisbrot, Esq., declare under penalty of perjury as follows:

18 1. I am a partner at the class action notice and settlement administration firm Angeion Group,  
19 LLC (“Angeion”). I am fully familiar with the facts contained herein based upon my personal  
20 knowledge.

21 2. My credentials, background and experience were previously described in my prior  
22 declaration filed with the Court on February 7, 2020 (Docket No. 280).

23 3. This declaration provides the Court with a summary of the work performed by Angeion  
24 regarding the implementation of the Notice Program and settlement administration.

25 **CAFA NOTICE**

26 4. On February 7, 2020, Plaintiffs filed a motion for preliminary approval of the Settlement  
27 Agreement and Release entered into between the Parties to this action. Accordingly, pursuant to  
28

1 28 U.S.C. § 1715(b), Angeion caused CAFA Notice regarding the initial settlement to be sent to  
2 the Attorneys General of all states and territories, as well as the Attorney General of the United  
3 States on February 14, 2020. A copy of the CAFA Notice is attached hereto as **Exhibit A**.

4 5. On March 26, 2020, Plaintiffs filed a supplemental motion for preliminary approval of the  
5 Amended Settlement Agreement and Release entered into between the Parties to this action (Docket  
6 No. 297). Accordingly, pursuant to 28 U.S.C. § 1715(b), Angeion caused the Supplemental CAFA  
7 Notice regarding the amended settlement to be sent to the Attorneys General of all states and  
8 territories, as well as the Attorney General of the United States on April 3, 2020. A copy of the  
9 Supplemental CAFA Notice is attached hereto as **Exhibit B**.

10 6. To date, no Attorneys General have inquired into or sought to intervene in the settlement.

#### 11 **CLASS DATA**

12 7. On November 23, 2020, Angeion received from counsel for the Defendant, a list of  
13 4,049,924 records containing in part, names, email addresses and/or phone numbers (“Class Data”).  
14 The Class Data records contained 6,075,210 email addresses, as some of the records had more than  
15 one email address. After the removal of duplicative records, there remained 3,539,106 unique  
16 records with a total of 5,101,541 valid email addresses, and 79,919 records with a name and/or  
17 phone number but no email address.

#### 18 **REVERSE LOOKUP SEARCHES**

19 8. On December 2, 2020, Angeion caused a reverse email address search (“append”) to be  
20 performed to locate email addresses using the names and phone numbers for the 79,919 records  
21 without email addresses. The append search utilizes data garnered from available first-party and  
22 third-party data provides to match the mobile telephone numbers and other available data points as  
23 a validity check to identify email addresses associated with those data points. As a result, 29,045  
24 email addresses were obtained.

#### 25 **SETTLEMENT WEBSITE**

26 9. On December 15, 2020, Angeion activated a case-specific website,  
27 **www.FacebookDataBreach.com** (the “Settlement Website”), where Settlement Class Members  
28

1 can easily view general information about this class action Settlement, review relevant Court  
 2 documents, and view important dates and deadlines pertinent to the Settlement. This case-specific  
 3 Settlement Website was designed to be user-friendly and makes it easy for Settlement Class  
 4 Members to find information about the case, including how to submit objections to or comments  
 5 on the Settlement. The Settlement Website also has a “Contact Us” page whereby Settlement Class  
 6 Members can send an email with any additional questions to a dedicated email address,  
 7 info@FacebookDataBreach.com.

#### 8 **TOLL-FREE HOTLINE**

9 10. On December 15, 2020, Angeion caused a toll-free number, 1-833-840-9003, to be  
 10 activated. The toll-free hotline utilizes an interactive voice response (“IVR”) system to provide  
 11 Settlement Class Members with responses to frequently asked questions and provide essential  
 12 information regarding the Settlement. This hotline is accessible 24 hours a day, 7 days a week.

#### 13 **DIRECT E-MAIL NOTICE**

14 11. Between December 15, 2020 and December 21, 2020, Angeion caused the E-mail Notice to  
 15 be sent to the 5,130,586 Settlement Class Members who had one or more valid email addresses  
 16 (5,101,541 provided by the Defendant plus 29,045 emails found via reverse search append). The  
 17 email notice was staggered and sent in waves to avoid “volume triggers” on spam filters that might  
 18 otherwise stop Class Members from getting notice. A copy of the E-mail Notice is attached hereto  
 19 as **Exhibit C**.

#### 20 **DIGITAL MEDIA NOTICE**

21 12. To help reach those class members whose emails were undeliverable, on December 24,  
 22 2020, Angeion caused Programmatic Display advertising and Facebook ads to commence. The  
 23 Programmatic Display portion (“banner ads”) of the Notice Program utilized standard IAB sizes  
 24 (160x600, 300x250, 728x90, 300x600, 320x50 and 300x50). Copies of the banner ads in all IAB  
 25 sizes and the Facebook ad are attached hereto as **Exhibit D**.

26 13. Through February 1, 2021, the banner notice resulted in serving 3,980,465 impressions  
 27 comprised of 2,411,839 programmatic impressions and 1,568,626 impressions served via  
 28

Facebook.

**PRINT PUBLICATION**

14. On December 21, 2020, Angeion also caused a one ½ page B&W insertion to be printed in *USA Today* (distributed on a national level, including digital e-Edition). A copy of the tear sheet is attached hereto as **Exhibit E**.

15. On December 25, 2020, Angeion caused a ½ page ad to be placed in People Magazine. A copy of the tear sheet is attached hereto as **Exhibit F**.

**OBJECTIONS**

16. The deadline to object to the Settlement is March 8, 2021. Angeion has not received any objections to the Settlement to date. Angeion will inform the parties of any objections it receives.

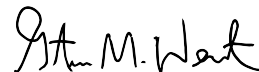
**CONCLUSION**

17. The Notice Program detailed herein was completed in compliance with the Court's December 30, 2020 deadline (ECF No. 314) and included direct notice to all reasonably identifiable Settlement Class Members. Further, the Notice Program successfully implemented a robust media campaign comprised of internet banner ad notice, print publication notice and a targeted social media campaign, coupled with the implementation of a dedicated Settlement Website and toll-free hotline to further inform Settlement Class Members of their rights and options in the Settlement.

18. It remains my opinion that the Notice Program implemented in this Settlement provided full and proper notice to Settlement Class Members and exceeds any requirement for notice under due process, Fed. R. Civ. P. 23 and the Northern District's Procedural Guidance for Class Action Settlements.

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

Dated: February 1, 2021.



STEVEN WEISBROT

# **EXHIBIT A**



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

February 14, 2020

VIA USPS PRIORITY MAIL

United States Attorney General &  
Appropriate Officials

**Re: Notice of Class Action Settlement**

*Adkins v. Facebook Inc.*

Dear Counsel or Official:

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

**Case Name:** Adkins v. Facebook, Inc.

**Index Number:** 3:18-cv-05982-WHA

**Jurisdiction:** United States District Court, Northern District of California, San Francisco Division

**Date Settlement Filed with Court:** February 7, 2020

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

1. **28 U.S.C. § 1715(b)(1)-Complaint:** *Class Action Complaint*, filed with the Court on September 28, 2018; *Consolidated Class Action Complaint*, filed with the Court on February 7, 2019; and the *Amended Consolidated Class Action Complaint*, filed with the Court on December 12, 2019.
2. **28 U.S.C. § 1715(b)(2)-Notice of Any Scheduled Judicial Hearings:** The Court has scheduled a hearing on March 5, 2020 at 8:00 a.m. for an order preliminarily approving the proposed class action settlement and directing notice of settlement.
3. **28 U.S.C. § 1715(b)(3)-Notification to Class Members:** *Declaration of Steven Weisbrot re: Notice Program*, filed with the Court on February 7, 2020. *Long Form Notice* and *Short Form Notice*, filed with the Court on February 7, 2020.
4. **28 U.S.C. § 1715(b)(4)-Class Action Settlement Agreement:** *Settlement Agreement and Release*, filed with the Court on February 7, 2020. Also included on the accompanying CD-ROM is *Plaintiff's Motion for Preliminary Approval and to Direct Notice of Settlement*, filed with the Court on February 7, 2020.

5. **28 U.S.C. § 1715(b)(5)-Any Settlement or Other Agreements:** *Stipulation and [Proposed] Order to Stay Further Proceedings Pending Settlement Approval*, filed with the Court on February 7, 2020. *Order to Stay Further Proceedings Pending Settlement Approval and Setting Hearing on Motion for Preliminary Approval*, issued on February 10, 2020. *Order Granting Facebook, Inc.'s Unopposed Motion to Continue Hearing on Plaintiff's Motion Form Preliminary Approval of Class Action Settlement*, issued on February 12, 2020.
6. **28 U.S.C. § 1715(b)(6)-Final Judgment:** The Court has not issued a Final Judgment or notice of dismissal as of the date of this CAFA Notice.
7. **28 U.S.C. § 1715(b)(7)(B)-Estimate of Class Members:** The Settlement Class contains approximately 4,000,000 Class Members located throughout the United States. The estimated proportional share of the Settlement benefits is not applicable, as injunctive relief is provided under this settlement pursuant to Rule 23(b)(2) of the Federal Rules of Civil Procedure.
8. **28 U.S.C. §1715(b)(8)-Judicial Opinions Related to the Settlement:** The Court has not issued a judicial opinion related to the Settlement at this time.

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

Sincerely,

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

Enclosures



# **EXHIBIT B**



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

April 3, 2020

VIA USPS PRIORITY MAIL

United States Attorney General &  
Appropriate Officials

**Re: Notice of Class Action Settlement**

*Adkins v. Facebook Inc.*

Dear Counsel or Official:

The purpose of this Supplemental Notice is to provide you with updated information relating to the below-described class action settlement. The below and attached are intended to supplement the original Notice provided to you on February 14, 2020:

**Case Name:** Adkins v. Facebook, Inc.

**Index Number:** 3:18-cv-05982-WHA

**Jurisdiction:** United States District Court, Northern District of California, San Francisco Division

**Date Settlement Filed with Court:** February 7, 2020

On March 5, 2020, the Court held a hearing regarding the settlement. The Court requested that the parties clarify certain information and modify the procedures for objecting to the settlement and any fee motion. On March 26, 2020, Plaintiff filed amended documents with the Court, including Plaintiff's Supplemental Brief in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement, and an Amended Settlement Agreement and Release.

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

1. **28 U.S.C. § 1715(b)(3)-Notification to Class Members:** *Amended Long Form Notice*, filed with the Court on March 26, 2020.
2. **28 U.S.C. § 1715(b)(4)-Class Action Settlement Agreement:** *Amended Settlement Agreement and Release*, filed with the Court on March 26, 2020. Also included on the accompanying CD-ROM is *Plaintiff's Supplemental Brief in Support of Plaintiff's Motion for Preliminary Approval of Class Action Settlement and to Direct Notice of Settlement*, filed with the Court on March 26, 2020.
3. **28 U.S.C. § 1715(b)(6)-Final Judgment:** The Court has not issued a Final Judgment or notice of dismissal as of the date of this CAFA Notice.

4. **28 U.S.C. § 1715(b)(7)(B)-Estimate of Class Members:** The Settlement Class contains approximately 4,000,000 Class Members located throughout the United States. The estimated proportional share of the Settlement benefits is not applicable, as injunctive relief is provided under this settlement pursuant to Rule 23(b)(2) of the Federal Rules of Civil Procedure.
5. **28 U.S.C. § 1715(b)(8)-Judicial Opinions Related to the Settlement:** The Court has not issued a judicial opinion related to the Settlement at this time.

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

Sincerely,

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

**Enclosures**

# EXHIBIT C

**If your Facebook account was impacted by  
the cyberattack Facebook experienced September 2018,  
a pending class action settlement may affect you.**

*Adkins, et al. v. Facebook, Inc.*, Case No. C 18-05982 WHA (JSC) (N.D. Cal.)

A Class Action Settlement has been proposed in litigation against Facebook, Inc. (“Facebook”), arising out of a cyberattack on the Facebook platform that was announced on September 28, 2018 (the “Data Breach”). Facebook denies any wrongdoing, and no court or other entity has made any judgment or other determination that Facebook has done anything wrong. Instead, both sides have agreed to a settlement.

**Am I included?**

You are a Settlement Class Member, and you are affected by this Settlement, if you are a Facebook user residing in the United States whose personal information was compromised in the Data Breach. If you are receiving this email Notice, you have been identified by the Settlement Administrator as a Settlement Class Member.

**What does the Settlement provide?**

The Settlement provides a number of security commitments by Facebook related to preventing attacks similar to the Data Breach. Facebook will also certify that the vulnerability that was exploited in the Data Breach has been eliminated. Facebook’s compliance with the Settlement will be assessed by an independent third-party expert for a period of five years. The Settlement will **not** affect your rights to sue Facebook for monetary damages. This is only a summary of the benefits. For complete information, dates, and details on the benefits, visit the settlement website at [www.facebookdatabreach.com](http://www.facebookdatabreach.com), or call 833-840-9003.

**What are my options?**

You may object to the Settlement by writing to the Court and the Settlement Administrator explaining why you do not think the Settlement should be approved. You can also write to the Court to support the Settlement. You are not required to do anything. Whether you object, comment, or do nothing, if the Settlement is approved, you will benefit from the commitments outlined in the Settlement, however you will not be eligible to sue Facebook for claims for injunctive and declaratory relief related to the Data Breach. The Settlement will not affect your rights to sue Facebook for monetary damages. The deadline to object is **March 8, 2021**.

Class Counsel have a deadline of February 8, 2021 to file a petition for fees and expenses. Counsel anticipate requesting no more than \$16,000,000 in fees and \$1,700,000 in expenses. Any awards are to be determined by the Court and to be paid by Facebook. Class Counsel’s fee and expense petition will be posted on the settlement website.

The Court has scheduled a hearing in this case at 11:00 a.m. on **April 8, 2021** in Courtroom 12 of the United States Courthouse, 450 Golden Gate Avenue, 19th Floor, San Francisco, CA 94102. At the hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate, as well Class Counsel’s application for attorneys’ fees, costs, and expenses and for a Service Award for the Settlement Class Representative. If there are objections, the Court will consider them. You may attend the hearing, or ask to speak at the hearing, but you do not have to do either to benefit from the Settlement. Due to COVID-19, the hearing may be conducted telephonically. If the Court conducts the Final Approval Hearing telephonically, dial-in information will be provided in advance and on the Settlement Website.

THIS IS ONLY A SUMMARY OF THE FULL NOTICE AND SETTLEMENT AGREEMENT,  
WHICH CONTAIN MORE DETAILED INFORMATION THAT YOU SHOULD READ.  
THE FULL NOTICE AND THE SETTLEMENT AGREEMENTS ARE AVAILABLE AT  
[www.facebookdatabreach.com](http://www.facebookdatabreach.com).

# **EXHIBIT D**

IF YOUR  
FACEBOOK  
ACCOUNT WAS  
IMPACTED BY THE  
CYBERATTACK  
FACEBOOK  
EXPERIENCED  
SEPTEMBER  
2018, A PENDING  
CLASS ACTION  
SETTLEMENT MAY  
AFFECT YOU.

CLICK HERE  
FOR MORE INFORMATION



IF YOUR FACEBOOK ACCOUNT WAS  
IMPACTED BY THE CYBERATTACK  
FACEBOOK EXPERIENCED SEPTEMBER  
2018, A PENDING CLASS ACTION  
SETTLEMENT MAY AFFECT YOU.

CLICK HERE  
FOR MORE INFORMATION



IF YOUR FACEBOOK ACCOUNT WAS IMPACTED BY THE CYBERATTACK FACEBOOK EXPERIENCED  
SEPTEMBER 2018, A PENDING CLASS ACTION SETTLEMENT MAY AFFECT YOU.

CLICK HERE  
FOR MORE INFORMATION





**IF YOUR FACEBOOK  
ACCOUNT WAS  
IMPACTED BY THE  
CYBERATTACK  
FACEBOOK  
EXPERIENCED  
SEPTEMBER 2018, A  
PENDING CLASS  
ACTION SETTLEMENT  
MAY AFFECT YOU.**

**CLICK HERE  
FOR MORE INFORMATION**



**IF YOUR FACEBOOK ACCOUNT WAS IMPACTED BY THE CYBERATTACK FACEBOOK  
EXPERIENCED SEPTEMBER 2018, A PENDING CLASS ACTION SETTLEMENT MAY AFFECT YOU.**

**CLICK HERE  
FOR MORE INFORMATION**



**IF YOUR FACEBOOK ACCOUNT WAS IMPACTED BY THE CYBERATTACK  
FACEBOOK EXPERIENCED SEPTEMBER 2018, A PENDING CLASS ACTION  
SETTLEMENT MAY AFFECT YOU.**

**CLICK HERE  
FOR MORE INFORMATION**



**IF YOUR FACEBOOK ACCOUNT WAS IMPACTED BY THE CYBERATTACK  
FACEBOOK EXPERIENCED SEPTEMBER 2018, A PENDING CLASS ACTION  
SETTLEMENT MAY AFFECT YOU.**

**CLICK HERE  
FOR MORE INFORMATION**





Angeion Group

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If your Facebook account was impacted by the cyberattack Facebook experienced September 2018, a pending class action settlement may affect you. Click here for more information.



FACEBOOKDATABREACH.COM

**Notice of Class Action – Adkins et al. v.  
Facebook, Inc.**

[Learn More](#)



# **EXHIBIT E**



AUTOS

# 2 SUVs, each with their own appeal

## Diesel engine goes toe to toe with luxury vehicle

**Mark Phelan**  
Detroit Free Press  
USA TODAY NETWORK

You’d have a hard time finding vehicles more different than some of those in my driveway recently. Among the latest: a high-mpg version of the year’s biggest new SUV, and a brand-defining luxury vehicle.

My neighbors recognize this congestion: It’s Vehicle of the Year season, when contenders for best new car, truck and SUV make their last pitches before journalists cast their votes.

Here are some brief impressions:

### 2021 Chevrolet Suburban 4WD Premier diesel

The broad strokes of the new Suburban’s story are well known by now: bigger, smoother, more advanced than GM’s previous big SUVs.

The news was under the hood of the big blue SUV in my driveway: a 3.0L inline-six diesel engine that delivers better fuel economy than some midsize pickups more than a foot shorter.

It’s widely accepted that diesel engines are on the way out, their reputation terminally tarnished by automakers that cheated emissions rules. Investment that might have gone to diesels in past decades has been redirected to electric powertrains that are cleaner, both in terms of their environmental impact and public image.

Judging by the new Suburban, diesels will go out with a roar. A rear-drive Suburban scored an exceptional 21 mpg in the city, 27 highway and 22 combined in EPA fuel economy tests. The combined figure is 6 mpg higher than a comparable Suburban with a 6.2L gasoline V8.

Just for yuks, it’s also 2 mpg better than the combined figure for a rear-drive V6 Toyota Tacoma midsize pick-



**The 2021 Chevrolet Suburban is bigger than its predecessor.**  
COURTESY OF CHEVROLET

#### At a glance

Four-wheel drive, seven-seat SUV

- **As tested:** \$77,820 (excluding destination charges)
- **Engine:** 3.0L I-6 diesel
- **Transmission:** 10-speed automatic
- **Power:** 277 hp @ 3,750 rpm; 460 pound-feet of torque @ 1,500 rpm
- **EPA fuel economy estimate:** 20 mpg city/26 highway/22 combined
- **Wheelbase:** 134.1 inches
- **Length:** 225.7 inches
- **Width:** 81.1 inches (without mirrors)
- **Height:** 75.7 inches
- **Curb weight:** 6,072 pounds

up. The crew cab Tacoma is a foot shorter and nearly a ton lighter, at 4,180 pounds.

Big vehicles that haul heavy trailers long distance – vehicles like the Suburban, newly luxurious for 2021 – are likely to be diesel’s last stand. GM’s 3.0L suggests the technology will go out with a roar, not a whimper.

### 2021 Genesis GV80 3.5T AWD Advanced+

The GV80 is the vehicle that should put Hyundai’s Genesis luxury brand on

the map. SUVs are the luxury market’s sweet spot. Brands with decades-old reputations for performance and style can barely give a new sport sedan away, but dealers can’t keep midsize and large luxury SUVs on the lot.

Genesis is only 5 years old. The new five- or seven-seat GV80 is its first SUV.

In a perfect world, the Korean brand would’ve debuted with the GV80 and another SUV rather than the two sedans it started with, but consumers’ shift from sedans to SUVs caught the auto industry by surprise.

The GV80 is a strong first effort. About the size of a Lincoln Aviator, it’s got the looks, inside and out, but a couple of features fall short, as they do on the G80 sedan that’s the SUV’s sibling.

The GV80’s interior is wrapped in attractive, soft leather and trimmed with genuine metal and open-pore wood. Sweeping horizontal lines accentuate the sense of a spacious cockpit. The leather seats in the \$64,450 GV80 3.5T Advanced+ I tested look more like architectural than automotive design. All prices exclude destination charges.

The dashboard is similarly attractive, but three key controls are harder to use than necessary.

A wide touch screen display for control navigation, phone, etc. is atop the dash, out of the driver’s reach. That’s because Genesis wants you to use a less than intuitive combination of a touch pad and dial. In addition, the “home” and “back” buttons didn’t take me to the main menu. Minor annoyances, but they add up over a long drive, particularly when there was more than enough room atop the dashboard to move the touch screen within easy reach.

The touch pad/dial is on the center console between the front seats. It’s next to a similar-size rotary shifter. The shifter doesn’t provide much feedback, and I continually found myself in neutral when I thought I’d selected drive or reverse.



**The 2021 Genesis GV80 is the luxury brand’s first SUV.**  
COURTESY OF GENESIS

#### At a glance

All-wheel-drive, seven-seat luxury SUV

- **As tested:** \$65,450 (excluding destination charges)
- **Engine:** 3.5L turbocharged V6
- **Transmission:** 8-speed automatic
- **Power:** 375 hp @ 5,800 rpm; 391 pound-feet of torque @ 1,300-4,500 rpm
- **EPA fuel economy estimate:** 21 mpg city/25 highway/22 combined
- **Wheelbase:** 116.3 inches
- **Length:** 194.7 inches
- **Width:** 77.8 inches
- **Height:** 67.5 inches
- **Curb weight:** 4,907-5,104 pounds

The GV80’s style and comfort will win it plenty of buyers. Most will be satisfied with its controls, but next time, the brand might consider more conventional controls, like those in its sister brand Hyundai’s new Elantra.

Speaking of the Elantra – base price less than a third of the GV80 I drove – that sedan had wireless Apple CarPlay, while the luxury model required your phone to be plugged into a USB. Given that the two vehicles were in development by the same company at the same time, it’s hard to call that anything but an oversight by Genesis.

## LEGAL MONDAY

For advertising information: 1.800.872.3433 www.marketplace.usatoday.com

### If your Facebook account was impacted by the cyberattack Facebook experienced September 2018, a pending class action settlement may affect you.

Adkins, et al. v. Facebook, Inc., Case No. C 18-05982 WHA (JSC) (N.D. Cal.)

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#### What are my options?

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The Court has scheduled a hearing in this case at 11:00 a.m. on **April 8, 2021** in Courtroom 12 of the United States Courthouse, 450 Golden Gate Avenue, 19th Floor, San Francisco, CA 94102. At the hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate, as well as Class Counsel’s application for attorneys’ fees, costs, and expenses and for a Service Award for the Settlement Class Representative. If there are objections, the Court will consider them. You may attend the hearing, or ask to speak at the hearing, but you do not have to do either to benefit from the Settlement. Due to COVID-19, the hearing may be conducted telephonically. If the Court conducts the Final Approval Hearing telephonically, dial-in information will be provided in advance and on the Settlement Website.

THIS IS ONLY A SUMMARY OF THE FULL NOTICE AND SETTLEMENT AGREEMENT, WHICH CONTAIN MORE DETAILED INFORMATION THAT YOU SHOULD READ. THE FULL NOTICE AND THE SETTLEMENT AGREEMENTS ARE AVAILABLE AT [WWW.FACEBOOKDATABREACH.COM](http://WWW.FACEBOOKDATABREACH.COM)

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF OHIO, WESTERN DIVISION

In re: MURRAY METALLURGICAL COAL HOLDINGS, LLC, et al., Chapter 11, Case No. 20-10390 (JEH) Debtor(s).

### NOTICE OF ENTRY OF CONFIRMATION ORDER, (II) OCCURRENCE OF EFFECTIVE DATE, AND (III) RELATED BAR DATES

**PLEASE TAKE NOTICE** that on November 25, 2020, the United States Bankruptcy Court for the Southern District of Ohio (the “Court”) entered an order (Docket No. 798) (the “Confirmation Order”) confirming the Debtors’ Third Amended Joint Plan Pursuant to Chapter 11 of the Bankruptcy Code (Docket No. 691) (the “Plan”).

**PLEASE TAKE FURTHER NOTICE** that the Effective Date, as defined in the Plan, occurred on **December 11, 2020**.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Confirmation Order, the release, injunction, and exculpation provisions in Article VIII of the Plan are now in full force and effect.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Article V.B of the Plan, unless otherwise provided by a Final Order of the Bankruptcy Court, all Proofs of Claim with respect to Claims arising from the rejection of Executory Contracts or Unexpired Leases pursuant to the Plan or the Confirmation Order, if any, must be filed with the Bankruptcy Court within 30 days after the later of (1) the date of entry of an order of the Bankruptcy Court (including the Confirmation Order) approving such rejection,

(2) the effective date of such rejection, or (3) the Effective Date. Any Claims arising from the rejection of an Executory Contract or Unexpired Lease not filed with the Bankruptcy Court within such time will be automatically disallowed forever barred from assertion, and shall not be enforceable against the Debtors, the Estates, the Wind-Down Trust, the Plan Administrator, the Winning Bidder, or the property of any of the foregoing Entities without the need for any objection by the Plan Administrator or further notice to, or action, order, or approval of the Bankruptcy Court or any other Entity, and any Claim arising out of the rejection of the Executory Contract or Unexpired Lease shall be deemed fully satisfied and released, notwithstanding anything in the Schedules or a Proof of Claim to the contrary. Claims arising from the rejection of the Debtors’ Executory Contracts or Unexpired Leases shall be classified as General Unsecured Claims, shall be treated in accordance with Article III.B of the Plan, and may be objected to in accordance with the provisions of Article VII of the Plan and the applicable provisions of the Bankruptcy Code and Bankruptcy Rules.

**PLEASE TAKE FURTHER NOTICE** that except as otherwise provided by the Confirmation Order, the Plan, or a Final Order of the Court, the deadline for filing requests for payment of Administrative Claims (other than (1) Professional Fee Claims, (2) Administrative Claims arising in the ordinary course of business, or

(3) Claims arising pursuant to section 503(b)(9) of the Bankruptcy Code), which

are required to be filed in accordance with the Plan) shall be **January 11, 2021** (which is the first Business Day that is 30 days after the Effective Date). If a Holder of an Administrative Claim (other than Professional Fee Claims, Administrative Claims arising in the ordinary course of business, and Claims arising pursuant to section 503(b)(9) of the Bankruptcy Code) that is required to but does not file and serve a request for payment of such Administrative Claim by the Administrative Claims Bar Date, such Holder shall be forever barred from asserting such Administrative Claims against the Debtors, the Post-Effective Date Debtors, their Estates, the Plan Administrator, or the Wind-Down Trust.

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Plan, the Deadline to file final requests for payment of Professional Fee Claims is **January 25, 2021** (which is the first Business Day that is 45 days after the Effective Date, the “Professional Fee Application Deadline”). All Professionals must file final requests for payment of Professional Fee Claims by no later than the Professional Fee Application Deadline to receive final approval of the fees and expenses incurred in the Chapter 11 Cases.

**PLEASE TAKE FURTHER NOTICE** that copies of the Plan, the Confirmation Order, and all other documents filed in these chapter 11 cases are available free of charge by visiting <http://cases.primedclerk.com/MurrayMet>. You may also obtain copies of any pleadings by visiting the Court’s website at <https://ecf.dhsb.uscourts.gov> in accordance with the procedures and fees set forth therein.

Dated: December 13, 2020, Columbus, Ohio. /s/ Thomas R. Allen, Thomas R. Allen (0017513), Richard K. Stovall (0029978), James A. Coutinho (0082430), Matthew M. Zofchak (0096279), Allen Stovall Neuman Fisher & Ashton, 17 South High Street, Suite 1220, Columbus, Ohio 43215, Telephone: (614) 221-8500, Facsimile: (614) 221-5988, Email: allen@asnfa.com, stovall@asnfa.com, coutinho@asnfa.com, zofchak@asnfa.com, Counsel to the Debtors and Debtors in Possession -and-

David M. Hillman (admitted pro hac vice), Timothy Q. Kacher (admitted pro hac vice), Chris Theodoridis (admitted pro hac vice), PROSKAUER ROSE LLP, Eleven Times Square, New York, New York 10036, Telephone: (212) 969-3000, Facsimile: (212) 969-2900, Email: dhillman@proskauer.com, tkacher@proskauer.com, ctheodoridis@proskauer.com -and- Charles A. Dale (admitted pro hac vice), PROSKAUER ROSE LLP, One International Place, Boston, Massachusetts 02110, Telephone: (617) 526-9600, Facsimile: (617) 526-9899, Email: cdale@proskauer.com, Counsel to the Debtors and Debtors in Possession

The Debtors in these Chapter 11 cases, along with the last four (4) digits of each Debtor’s federal tax identification number, if applicable, are: Murray Metallurgical Coal Holdings, LLC (4633); Murray Eagle Mining, LLC (4268); Murray Alabama Minerals, LLC (4047); Murray Alabama Coal, LLC (3838); Murray Maple Eagle Coal, LLC (4435); and Murray Oak Grove Coal, LLC (4878). The Debtors’ primary business address is 46226 National Road, St. Clairsville, OH 43950.

Capitalized terms used but not otherwise defined in this notice shall have the meanings given to them in the Plan.

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# **EXHIBIT F**





**RICHIE SAMBORA**  
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January 4, 2021

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The stars of the megahit show **Home Town** on keeping their marriage strong and raising 3-year-old daughter **Helen**: 'Nothing is worth missing out on memories together'





If your Facebook account was impacted by the cyberattack Facebook experienced September 2018, a pending class action settlement may affect you.

Adkins, et al. v. Facebook, Inc., Case No. C 18-05982 WHA (JSC) (N.D. Cal.)

A Class Action Settlement has been proposed in litigation against Facebook, Inc. ("Facebook"), arising out of a cyberattack on the Facebook platform that was announced on September 28, 2018 (the "Data Breach"). Facebook denies any wrongdoing, and no court or other entity has made any judgment or other determination that Facebook has done anything wrong. Instead, both sides have agreed to a settlement.

#### Am I included?

You are a Settlement Class Member, and you are affected by this Settlement, if you are a Facebook user residing in the United States whose personal information was compromised in the Data Breach. If you received an email Notice of this Settlement, you have been identified by the Settlement Administrator as a Settlement Class Member.

#### What does the Settlement provide?

The Settlement provides a number of security commitments by Facebook related to preventing attacks similar to the Data Breach. Facebook will also certify that the vulnerability that was exploited in the Data Breach has been eliminated. Facebook's compliance with the Settlement will be assessed by an independent third-party expert for a period of five years. This is only a summary of the benefits. For complete information, dates, and details on the benefits, visit the settlement website at [www.facebookdatabreach.com](http://www.facebookdatabreach.com), or call 1-833-840-9003.

#### What are my options?

You may object to the Settlement by writing to the Court and the Settlement Administrator and explaining why you do not think the Settlement should be approved. You can also write to the Court to support the Settlement. You are not required to do anything. Whether you object, comment, or do nothing, if the Settlement is approved, you will benefit from the commitments outlined in the Settlement, however you will not be eligible to sue Facebook for claims for injunctive and declaratory relief related to the Data Breach. The Settlement will not affect your rights to sue Facebook for monetary damages. The deadline to object is **March 8, 2021**.

Class Counsel have a deadline of February 8, 2021 to file a petition for fees and expenses. Counsel anticipate requesting no more than \$16,000,000 in fees and \$1,700,000 in expenses. Any awards are to be determined by the Court and to be paid by Facebook. Class Counsel's fee and expense petition will be posted on the settlement website.

The Court has scheduled a hearing in this case at 11:00 a.m. on **April 8, 2021** in Courtroom 12 of the United States Courthouse, 450 Golden Gate Avenue, 19th Floor, San Francisco, CA 94102. At the hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate, as well Class Counsel's application for attorneys' fees, costs, and expenses and for a Service Award for the Settlement Class Representative. If there are objections, the Court will consider them. You may attend the hearing, or ask to speak at the hearing, but you do not have to do either to benefit from the Settlement. Due to COVID-19, the hearing may be conducted telephonically. If the Court conducts the Final Approval Hearing telephonically, dial-in information will be provided in advance and on the Settlement Website.

THIS IS ONLY A SUMMARY OF THE FULL NOTICE AND SETTLEMENT AGREEMENT, WHICH CONTAIN MORE DETAILED INFORMATION THAT YOU SHOULD READ. THE FULL NOTICE AND THE SETTLEMENT AGREEMENTS ARE AVAILABLE AT [WWW.FACEBOOKDATABREACH.COM](http://WWW.FACEBOOKDATABREACH.COM)



"Fame," says Dickinson (Hailee Steinfeld), "is a fickle food."

#### APPLE TV+ | Dickinson

**COMEDY-DRAMA** Season 2 begins with Emily Dickinson (Hailee Steinfeld) sure of her genius and ready to give herself over to what another poet, Joni Mitchell, called the star-maker machinery—she wants to be published. The show, with its pop music, random humor and modern slang ("Your mom's biscuits are the bomb"), cleverly—and gleefully—projects the sensibility of a young 21st-century woman onto one from the 19th century. It's as if a skateboarder made a show about Walt Whitman.

(First three episodes launch Jan. 8)



#### APPLE TV+ | Wolfwalkers

**FAMILY** In a long-ago Ireland, young Robyn Goodfellowe wanders alone outside the secure walls of town and befriends a strange girl, Mebh, who belongs to a magical tribe that is both wolf and human. This is an extraordinarily pretty animated film, striking in the meticulous richness of both its natural and its mystical imagery. (Streaming now)