

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<p>Etta Calhoun, Sherry Porter, and Cynthia Gray, on behalf of themselves and all other persons similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>Invention Submission Corporation d/b/a InventHelp, Technosystems Consolidated Corp., Technosystems Service Corp., Western Invention Submission Corp., Universal Payment Corporation, Intromark Incorporated, Robert J. Susa, Thomas Frost, P.A., Thomas Frost, John Doe Companies 1-10, John Doe Individuals 1-10,</p> <p style="text-align: center;">Defendants.</p>	<p>No. 2:18-cv-01022</p> <p>Magistrate Judge Patricia L. Dodge</p>
<p>Carla Austin and Nil Leone, individually and on behalf of all others similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>Invention Submission Corp. d/b/a InventHelp, Western Invention Submission Corp. d/b/a Western InventHelp, Intromark Incorporated, and Technosystems Service Corporation,</p> <p style="text-align: center;">Defendants.</p>	<p>No. 2:19-CV-01396</p> <p>Magistrate Judge Patricia L. Dodge</p>
<p>Geta Miclaus and Vim and Kevin Byrne, on behalf of themselves and all other persons similarly situated,</p> <p style="text-align: center;">Plaintiffs,</p>	<p>No. 2:20-cv-681</p> <p>Magistrate Judge Patricia L. Dodge</p>

<p>v.</p> <p>Invention Submission Corporation d/b/a InventHelp, Technosystems Consolidated Corp., Technosystems Service Corp., Western Invention Submission Corp. d/b/a Western InventHelp, Universal Payment Corporation, Intromark Incorporated, Robert J. Susa, Thomas Frost, P.A., Thomas Frost, John Doe Companies 1-10, John Doe Individuals 1-10,</p> <p>Defendants.</p>	
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**STIPULATED ORDER AMENDING THE COURT’S ORDER GRANTING
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT, PROVISIONALLY
CERTIFYING SETTLEMENT CLASS, DIRECTING NOTICE TO
THE SETTLEMENT CLASS, AND SCHEDULING FINAL APPROVAL HEARING**

WHEREAS, on August 24, 2022, the Court entered its Order Granting Preliminary Approval of Class Action Settlement, Provisionally Certifying Settlement Class, Directing Notice to Settlement Class, and Scheduling Final Approval Hearing (“Preliminary Approval Order,” ECF No. 235);

WHEREAS, in order to facilitate Notice to the Settlement Class, Paragraph 11 of the Court’s Preliminary Approval Order required that the InventHelp Defendants¹ provide the Court-appointed Settlement Administrator, Angeion Group, LLC (“Angeion”), with “a confidential spreadsheet that identifies all individuals in the Settlement Class by name, last known address, last known email address (if available), and last known telephone number (if available)” (“Settlement Class Spreadsheet”);

¹ “InventHelp Defendants” refers to Defendants Invention Submission Corporation d/b/a InventHelp, Western Invention Submission Corporation d/b/a Western InventHelp, Technosystems Consolidated Corporation, Technosystems Service Corporation, Intromark Incorporated, Universal Payment Corporation, and Robert Susa.

WHEREAS, Paragraph 12 of the Court's Preliminary Approval Order required, among other things, that Angeion distribute the Notice of Class Action Settlement and Claim Form to the Settlement Class within twenty-one (21) days after entry of the Preliminary Approval Order, or by September 14, 2022;

WHEREAS, the InventHelp Defendants provided Angeion with the Settlement Class Spreadsheet pursuant to the terms of the Preliminary Approval Order;²

WHEREAS, upon receipt and review of the Settlement Class Spreadsheet, Angeion determined that the various sub-categories of relief afforded by the Settlement, as well as certain Settlement Class Members being eligible for relief under more than one sub-category based on various contracts with the InventHelp Defendants, created complexities that required significant additional technical and manual work by Angeion to prepare dozens of iterations of the appropriate forms, and then individualize them as required, in hard copy and electronic form;³

WHEREAS, the additional analysis conducted by Angeion with respect to Settlement Class Member data, and the additional work performed by Angeion to prepare significant variations of the Notice of Class Action Settlement and Claim Form to address the sub-categories of relief, took substantial time to complete, exacerbated by challenges encountered by Angeion in preparation for notice production and fulfillment relating primarily to the various forms of relief available to different Settlement Class Members, as well as the instances in which Settlement Class Members may make an election as to their preferred form of relief;⁴

² Attached as Exhibit A to this Proposed Stipulated Order is the Declaration of Steve Platt on Behalf of Settlement Administrator Angeion Group, LLC ("Platt Decl."). See Platt Decl. at ¶ 5.

³ Platt Decl. at ¶¶ 7-8.

⁴ Platt Decl. at ¶¶ 9-10.

WHEREAS, due to the encountered complexities and challenges, Angeion was unable to distribute the Notice of Class Action Settlement and Claim Form by September 14, 2022, and it requires 21 days from the Court's endorsement of this Proposed Stipulated Order to do so (to allow time to update all the forms with the new deadlines and send everything to production);⁵

WHEREAS, the Court has reviewed the terms of this Order;

WHEREAS, the Court having found good cause for issuance of this Order;

NOW, THEREFORE, the Court hereby ORDERS as follows:

1. Angeion Group, LLC is directed to distribute the Notice of Class Action Settlement and Claim Form attached as Exhibits A and B to the Settlement Agreement, respectively,⁶ to the Settlement Class within 21 days of this Order (the "Notice Date");
2. All dates set forth in the Settlement Agreement and Preliminary Approval Order that are triggered off the Notice Date are extended accordingly;
3. The date of the final approval hearing is February 1st, 2023 at 9:30 a.m.
4. Other than the relief granted herein with respect to the Notice Date, nothing in this Stipulated Order shall be construed to amend or otherwise alter the terms of the Court's Preliminary Approval Order.

Dated: October 5, 2022

Respectfully submitted,

BERGER MONTAGUE PC

By: s/ Shanon J. Carson
Shanon J. Carson

⁵ Platt Decl. at ¶ 11.

⁶ A true and correct copy of the Settlement Agreement, with Exhibits, is attached as Exhibit 1 to the Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Settlement Agreement. ECF No. 230.

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*Counsel for Defendants Thomas
Frost, P.A. and Thomas Frost*

SO ORDERED this 17th day of October, 2022

BY THE COURT:

s/ Patricia L Dodge
Patricia L. Dodge
United States Magistrate Judge