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**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF CLARK**

In Re Clark County Data Breach Litigation

No. 25-2-02214-06

**DECLARATION OF STEPHANIE
SAUNDERS, ESQ. OF ANGEION
GROUP, LLC
RE: IMPLEMENTATION OF NOTICE &
SETTLEMENT ADMINISTRATION**

1 I, Stephanie Saunders, Esq., declare as follows:

2 1. I am a Vice President of Class Action and Mass Tort Services at the class action notice
3 and settlement administration firm Angeion Group, LLC (“Angeion”). I am over 21 years of age and
4 am not a party to this action. I am fully familiar with the facts contained herein based upon my
5 personal knowledge, as well as information provided to me by my colleagues in the ordinary course
6 of business at Angeion.

7 2. I am a licensed attorney in the Commonwealth of Pennsylvania and practiced as a class
8 action attorney for more than eight years at a nationally recognized litigation firm. Prior to practicing
9 law, I developed substantial professional expertise in marketing and advertising within the media and
10 publishing industry, as well as at one of the largest financial institutions in the United States. This
11 combined legal and marketing background uniquely positions me to evaluate and implement effective
12 class action notice programs.

13 3. In my professional roles focused on marketing, advertising, and audience-driven
14 communications, I led the development and execution of integrated, multi-channel marketing and
15 advertising campaigns across mass media, digital, and direct channels. I regularly translate complex,
16 technical, and highly regulated subject matter into clear, accessible, and audience-appropriate
17 messaging.

18 4. This experience is directly applicable to the design, evaluation, and implementation of
19 class action notice programs. I routinely apply these principles to develop notice plans that are
20 strategically targeted, legally compliant, and optimized to maximize reach, comprehension, and
21 participation among class members. My work emphasizes clarity, accuracy, and effectiveness,
22 consistent with due process requirements and established best practices governing class action notice.

23 5. I have been directly involved in the planning and execution of numerous court-
24 approved notice and claims administration programs, both during my legal practice and in my current
25 role, including some of the largest and most complex notice programs implemented by Angeion. This
26 experience provides me with a comprehensive understanding of the practical, legal, and operational
27 considerations necessary to design and assess notice programs in complex class action matters.

6. Angeion is not related to or affiliated with the Plaintiffs, Class Counsel, Defendant, or Defendant's Counsel.

7. Angeion was appointed to serve as the Claims Administrator pursuant to the Court's Preliminary Approval Order and was directed to provide notice to the Settlement Class and administer the Settlement in accordance with the terms of the Settlement Agreement.

8. The purpose of this Declaration is to provide the Court and the Parties with a summary of Angeion's efforts to disseminate notice in accordance with the approved Notice Plan and to administer the Settlement pursuant to the Settlement Agreement.

CLASS DATA

9. On or about June 2, 2026, Defendant’s Counsel provided Angeion with an electronic file containing Settlement Class Member names and last known mailing addresses. Angeion reviewed the data file and removed duplicate records, resulting in 76,275 unique records (the “Settlement Class List”).

DIRECT NOTICE

Mailed Notice

10. On June 26, 2026, Angeion caused Notice of the Settlement (“Postcard Notice”) to be mailed by the United States Postal Service (“USPS”) First-Class Mail, postage prepaid, to the 76,275 Settlement Class Member addresses on the Settlement Class List. A true and correct copy of the Postcard Notice is attached hereto as **Exhibit A**.

11. Prior to mailing the Postcard Notice, Angeion processed the mailing addresses on the Settlement Class List through the USPS National Change of Address (“NCOA”) database to identify updated addresses for individuals who had moved within the prior four years and filed a change-of-address request with USPS. Angeion incorporated NCOA address updates into the Settlement Class List before mailing the Postcard Notice.

12. Postcard Notices that were returned by the USPS as undeliverable with a forwarding address were re-mailed to that forwarding address. Postcard Notices that were returned by the USPS without a forwarding address were subjected to an address verification search (“skip trace”) in an

1 attempt to locate an updated address. As a result of the above-described efforts, of the 17,977 Postcard
2 Notices returned as undeliverable by the USPS, 8,903 were remailed to updated addresses. As of the
3 date of this Declaration, 429 of the remailed Postcard Notices have been returned as undeliverable a
4 second time by the USPS.

5 13. As a result of the notice efforts described above, Angeion currently estimates that
6 Postcard Notice was successfully delivered to 66,772 Settlement Class Members, representing
7 approximately 87.5% of the 76,275 Settlement Class Members on the Settlement Class List.¹

8 14. In *Judge's Class Action Notice and Claims Process Checklist and Plain Language*
9 *Guide*, the Federal Judicial Center identifies 70% as a "high" percentage for notice reach. Notice was
10 successfully delivered to 87.5% of the Settlement Class, meeting and exceeding this threshold.

11 **SETTLEMENT WEBSITE**

12 15. On or before June 26, 2026, Angeion established the following website dedicated to
13 this Settlement: www.ClarkCountyDataSettlement.com (the "Settlement Website"). The Settlement
14 Website was designed to be user-friendly and provides Settlement Class Members with general
15 information about the Settlement, including important dates and deadlines and answers to frequently
16 asked questions. The Settlement Website also allows Settlement Class Members to view or download
17 important case documents, including the Complaint, Settlement Agreement, Preliminary Approval
18 Order, Long Form Notice in English and Spanish, and the Claim Form.

19 16. The Settlement Website also includes a "Contact" page that provides the Claims
20 Administrator's contact information and allows Settlement Class Members to submit additional
21 questions by email to the dedicated email address, info@ClarkCountyDataSettlement.com.

22 17. Settlement Class Members may also securely submit a Claim Form and upload
23 supporting documentation through the dedicated online portal available on the Settlement Website.

24
25 ¹ For purposes of this calculation, a Postcard Notice is considered "successfully delivered" if it was mailed and
26 not returned by the USPS as undeliverable, or if it was remailed to an updated address and not subsequently
27 returned by the USPS as undeliverable. The percentage was calculated by dividing the number of Settlement
28 Class Members to whom notice was successfully delivered (76,275 Postcard Notices mailed minus 17,977
returned as undeliverable plus 8,903 remailed minus 429 returned as undeliverable remailed = 66,772) by the
total number of unique Settlement Class Members on the Settlement Class List (76,275).

18. As of the date of this Declaration, the Settlement Website has received approximately 2,202 unique visitors resulting in approximately total 12,033 pageviews.

TOLL-FREE HOTLINE

19. On or before June 26, 2026, Angeion activated the following toll-free number dedicated to this Settlement: 1-866-450-4275. The toll-free hotline utilizes an interactive voice response (“IVR”) system to provide Settlement Class Members with responses to frequently asked questions and provide essential information regarding the Settlement, including important dates and deadlines. The toll-free hotline is accessible 24 hours a day, 7 days a week.

20. As of the date of this Declaration, Angeion has received 741 calls totaling approximately 3,366 minutes.

CLAIM FORMS

21. The deadline for Settlement Class Members to submit a Claim Form is September 24, 2026. As of the date of this Declaration, Angeion has received approximately 2,098 Claim Form submissions, representing approximately 2.8% of the 76,275 unique Settlement Class Members on the Settlement Class List. These Claim Form submissions remain subject to final audits, including the full assessment of each claim’s validity and a review for duplicate submissions.

22. Angeion will continue to report to the Parties the number of Claim Forms received and processed through the Claims Deadline.

EXCLUSIONS & OBJECTIONS

23. The deadline for Settlement Class Members to submit a request for exclusion from the Settlement was August 25, 2026. As of the date of this declaration, Angeion has received three (3) timely exclusion requests. The names of the individuals who have timely requested exclusion from the Settlement are included in **Exhibit B** attached hereto.

24. The deadline for Settlement Class Members to submit an objection to the Settlement was August 25, 2026. As of the date of this declaration, Angeion has not received, nor been made aware of any written objections.

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EXHIBIT A

**COURT-AUTHORIZED NOTICE OF
CLASS ACTION SETTLEMENT**

*In re: Clark County, Data Security
Litigation*, No. 25-2-02214-06
Clark County Superior Court
State of Washington

**If you are an individual residing
in the United States whose
information was potentially
impacted by the Data Security
Incident experienced by Clark
County, Washington in October
2023, you may be eligible for
benefits from a class action
settlement**

*Para una notificación en español,
visite nuestro sitio de web
www.ClarkCountyDataSettlement.com*

This notice is only a summary.

Visit
www.ClarkCountyDataSettlement.com
or call toll-free
1-866-450-4275 for more information.

Clark County Data Security Litigation
c/o Claims Administrator
1650 Arch Street, Suite 2210
Philadelphia, PA 19103

«ScanString»

Postal Service: Please do not mark barcode

Notice ID: «Notice ID»

Confirmation Code: «Confirmation Code»

«FirstName» «LastName»

«Address1»

«Address2»

«City», «StateCd» «Zip»

«CountryCd»

A proposed settlement has been reached with Clark County, Washington ("Defendant"), arising out of a data security incident that occurred in or around October 2023 during which unauthorized third parties allegedly gained access to certain files containing the personal information of Clark County's current and former residents ("Data Security Incident"). Following the Data Security Incident, several individuals sued Defendant. Defendant denies all claims alleged against it and denies all charges of wrongdoing or liability. The settlement is not an admission of wrongdoing or an indication that Defendant has violated any laws, but rather the resolution of disputed claims.

Am I Included? Yes. Defendant's records indicate your private information may have been involved in the Data Security Incident.

Settlement Benefits. The settlement provides for an \$800,000 Settlement Fund to pay for (1) payments to Settlement Class Members of up to \$5,000 for documented out-of-pocket losses; (2) attorney's fees and litigation expenses; (3) service awards to the Class Representatives; and (4) costs of Claims Administration. Settlement Class Members' payments will be reduced or increased on a *pro rata* basis depending on the number of Valid Claims submitted.

How Do I Receive Benefits? You may submit a Claim Form online at www.ClarkCountyDataSettlement.com or via mail, postmarked no later than **September 24, 2026** (Claim Forms received via mail without a postmark date shall be considered timely if they are received within 3 days of the September 24, 2026 deadline). You will not receive a payment from the settlement if you fail to submit a Claim Form.

What Are My Options? If you **do nothing** or **submit a Claim Form**, you will not be able to sue or continue to sue the Defendant about the claims resolved by this settlement. If you **exclude yourself**, you will not receive a payment, but you will keep your right to sue Defendant in a separate lawsuit about the claims resolved by this settlement. If you do not exclude yourself, you can **object** to the settlement. The deadline to exclude yourself from the settlement or to object to the settlement is **August 25, 2026**. Visit www.ClarkCountyDataSettlement.com for complete details on how to **exclude yourself from or object to the settlement, and instructions if you want to appear and/or speak at the Final Fairness Hearing**.

Do I Have a Lawyer? Yes. The Court has appointed M. Anderson Berry of Emery Reddy, P.C. as Class Counsel to represent you and all Settlement Class members.

The Final Fairness Hearing. A Final Fairness Hearing will be held at 1:30 pm, on September 30, 2026, in Courtroom Department 5 located 1200 Franklin Street, Vancouver, WA 98660, where the Court will consider whether the proposed settlement is fair, reasonable, and adequate. The Court may also consider Class Counsel's request for an award of attorneys' fees and litigation expenses, and service awards. The Court will consider any objections at the hearing.

This Notice is only a Summary. For complete information, please visit www.ClarkCountyDataSettlement.com or call toll-free 1-866-450-4275.

EXHIBIT B

Exclusions

1. Colleen Chun
2. Dana Field
3. Alan Walter