

EXHIBIT A

**IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT, IN AND FOR
BROWARD COUNTY, FLORIDA**

JAMES WADE AND MICHAEL CHAVARRIA,
on behalf of himself and all others similarly
situated,

Plaintiffs,

v.

THE DAILY WIRE, LLC,

Defendant

Civil Action No.: CACE-24-003886

**DECLARATION OF NOTICE OF STEVEN WEISBROT OF ANGEION GROUP
RE: IMPLEMENTATION OF NOTICE PLAN & SETTLEMENT ADMINISTRATION**

I, Steven Weisbrot, hereby declare as follows:

1. I am the President and Chief Executive Officer at the class action notice and claims administration firm Angeion Group, LLC (“Angeion”). Angeion specializes in designing, developing, analyzing, and implementing large-scale, un-biased, legal notification plans.

2. I am fully familiar with the facts contained herein based upon my personal knowledge, as well as information that has been provided to me by my colleagues in the ordinary course of business at Angeion. In forming my opinions regarding notice in this action, I have drawn from my extensive class action experience, as described below.

3. I have been responsible in whole or in part for the design and implementation of hundreds of court-approved notice and administration programs, including some of the largest and most complex notice plans in recent history. I have taught numerous accredited Continuing Legal Education courses on the Ethics of Legal Notification in Class Action Settlements, using Digital Media in Due Process Notice Programs, as well as Claims Administration, generally. I am the author of multiple articles on Class Action Notice, Claims Administration, and Notice Design in publications such as Bloomberg, BNA Class Action Litigation Report, Law360, the ABA Class

Action and Derivative Section Newsletter, and I am a frequent speaker on notice issues at conferences throughout the United States and internationally.

4. I was certified as a professional in digital media sales by the Interactive Advertising Bureau (“IAB”) and I am co-author of the Digital Media section of Duke Law’s *Guidelines and Best Practices—Implementing 2018 Amendments to Rule 23* and the soon to be published George Washington Law School *Best Practices Guide to Class Action Litigation*.

5. I have given public comment, and written guidance to the Judicial Conference Committee on Rules of Practice and Procedure on the role of direct mail, email, broadcast media, digital media, and print publication, in effecting Due Process notice, and I have met with representatives of the Federal Judicial Center to discuss the 2018 amendments to Rule 23 and offered an educational curriculum for the judiciary concerning notice procedures.

6. Prior to joining Angeion’s executive team, I was employed as Director of Class Action Services at Kurtzman Carson Consultants, an experienced notice and settlement administrator. Prior to my notice and claims administration experience, I was employed in private law practice.

7. My notice work comprises a wide range of class actions that include product defects, data breach and privacy matters, false advertising, mass disasters, employment discrimination, antitrust, tobacco, banking, firearm, insurance, and bankruptcy cases.

8. I have been at the forefront of infusing digital media, as well as big data and advanced targeting, into class action notice programs. Courts have repeatedly recognized my work in the design of class action notice programs.

9. By way of background, Angeion is an experienced class action notice and claims administration company formed by a team of executives that have had extensive tenures at five other nationally recognized claims administration companies. Collectively, the management team at Angeion has overseen more than 2,000 class action settlements and distributed over \$15 billion to class members. The executive profiles as well as the company overview are available at www.angeiongroup.com.

10. As a class action administrator, Angeion has regularly been approved by both federal and state courts throughout the United States and abroad to provide notice of class actions and claims processing services.

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

12. Pursuant to the Court's Order on Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement, Angeion was appointed to serve as the Settlement Administrator and was directed to disseminate Notice in accordance with the Notice provisions in the Settlement Agreement.

13. The purpose of this declaration to provide the Parties and the Court with a summary of the work performed to disseminate notice and other administrative tasks.

SETTLEMENT CLASS LIST

14. On or about April 22, 2025, Defendant's Counsel provided Angeion with three (3) spreadsheets containing names and email addresses for Settlement Class Members. Angeion reviewed and deduplicated the records provided resulting in a total of 1,958,840 unique Settlement Class Member records (the "Settlement Class List").

EMAIL NOTICE

15. Prior to disseminating notice, Angeion validated the email addresses provided and determined that 1,883,442 emails were valid. On July 18, 2025, Angeion caused Notice of the Settlement to be emailed ("Email Notice") to the 1,883,442 Settlement Class Members with a valid email address on the Settlement Class List. A total of 1,865,705 Email Notices were delivered and 17,737 could not be delivered, which equates to a direct notice reach rate of approximately 95.25%.¹ This reach rate is consistent with other court-approved, best-practicable notice programs and Federal Judicial Center Guidelines, which state that a notice plan that reaches² over 70% of

¹ This was calculated by dividing the number of Email Notices delivered (1,865,705) by the number of unique Settlement Class Members on the Settlement Class List (1,958,840).

² FED. JUD. CTR., *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide* (2010), available at <https://www.fjc.gov/sites/default/files/2012/NotCheck.pdf>. The guide suggests that the minimum threshold for adequate notice is 70%.

targeted class members is considered a high percentage and the “norm” of a notice campaign.³ A true and accurate copy of the Email Notice is attached hereto as **Exhibit A**.

REMINDER EMAIL NOTICE

16. Beginning on August 27, 2025, Angeion caused a reminder Notice of the Settlement to be emailed (“Reminder Email Notice”) to 1,852,426 Settlement Class Members whose initial Email Notice was delivered and who had not already submitted a Claim Form or unsubscribed from receiving further communication via email. A true and accurate copy of the Reminder Email Notice is attached hereto as **Exhibit B**.

17. With the provision of direct Email Notice along with a Reminder Email Notice, the Notice Program for this Settlement was the best practicable under the circumstances and complied with this Courts Orders as well as with all applicable laws, including but not limited to, the Due Process Clause of the United States Constitution, and the State of Florida.

SETTLEMENT WEBSITE

18. On June 30, 2025, Angeion established the following website dedicated to this Settlement: www.DWVPPASettlement.com (“Settlement Website”). The Settlement Website was designed to be user friendly and make it easy for Settlement Class Members to find answers to frequently asked questions, important dates and deadlines, and the contact information for the Settlement Administrator.

19. During the Claims Period, Settlement Class Members were able to securely submit a Claim Form via a customized online portal on the Settlement Website. The Settlement Website also allows Settlement Class Members to view or download copies of the Claim Form, Long Form Notice, Settlement Agreement, Preliminary Approval Order, and other settlement related documents. True and accurate copies of the Long Form Notice and Claim Form are attached hereto as **Exhibit C** and **Exhibit D** respectively.

20. As of October 7, 2025, the Settlement Website has received 76,239 unique visitors totaling 185,232 page views.

³ Barbara Rothstein and Thomas Willging, Federal Judicial Center Managing Class Action Litigation: A Pocket Guide for Judges, at 27 (3d ed. 2010).

TOLL-FREE HOTLINE

21. On July 18, 2025, Angeion also established a toll-free hotline dedicated to this Settlement to further apprise Settlement Class Members of their rights and options in the Settlement: 1-888-486-4161. 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. Settlement Class Members may also leave a message for the Settlement Administrator to provide updated information, request a copy of the notice and/or Claim Form to be mailed to them, or to request a callback. The toll-free hotline is accessible 24 hours a day, 7 days a week. As of the date of this declaration, the toll-free telephone number has received 88 phone calls which lasted a total of 238 minutes.

CLAIM FORM SUBMISSIONS

22. The deadline for Settlement Class Members to submit a Claim Form was September 8, 2025. As of October 7, 2025, Angeion has received 21,039 Claim Forms (20,253 via the online portal and 786 via mail).

23. As of October 7, 2025, Angeion has completed its review of 20,968 of the Claim Forms received⁴. Of the 20,968 Claim Forms, 20,213 claims have been approved, 116 claims have been identified as duplicative, 18 claims were submitted by a Settlement Class Member but were incomplete and will receive a deficiency notice, 621 claims have been identified as ineligible as this group of claimants could not be matched to the Settlement Class List. Claims identified as ineligible will be issued a denial notice informing those claimants that they have thirty (30) days to respond with information/documentation that establishes membership in the Settlement Class.

EXCLUSION REQUESTS AND OBJECTIONS

24. The deadline for Settlement Class Members to exclude themselves from the Settlement was September 1, 2025. As of October 7, 2025, Angeion has received fourteen (14) requests for exclusion. A list containing the names of the individuals requesting exclusion from the Settlement is attached as **Exhibit E**.

25. The deadline for Settlement Class Members to object to the Settlement was

⁴ Angeion has recently received 71 claims via the mail and is currently reviewing these claims.

September 1, 2025. Angeion has not received any objections to the Settlement.

26. Angeion will inform the Parties of any additional exclusion requests or objections to the Settlement it receives.

NOTICE AND ADMINISTRATION COSTS

27. Through August 31, 2025, the cost to provide notice and administration services totaled \$63,444.68. Angeion will continue to keep the Parties apprised of actual costs incurred to provide administrative services.

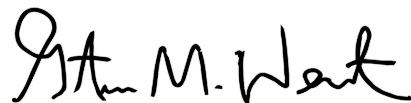
CONCLUSION

28. The notice plan featured direct notice via email to all reasonably identifiable Settlement Class Members, with an additional reminder email notice, and the implementation of a dedicated Settlement Website and toll-free telephone support to further inform Settlement Class Members of their rights and options in the Settlement.

29. In my professional opinion, the notice plan described herein provided full and proper notice to Settlement Class Members and was the best practicable notice under the circumstances, fulfilling all due process requirements, and satisfying the requirements of Fla. R. Civ. P. Rule 1.220(d)(2).

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

Dated: October 8, 2025



STEVEN WEISBROT

Exhibit A

Subject: NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

From: DoNotReply@DWVPPASettlement.com

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT
Circuit Court of the 17th Judicial Circuit, in and for Broward County, Florida
***Wade v. The Daily Wire, LLC.*, Case No. CACE-24-003886**

Our records indicate you may be entitled to a payment from a class action settlement because you were a log-in account holder to a Daily Wire website such as www.dailywire.com.

Click [HERE](#) To File A Claim.

Claims Must be Submitted no later than September 8, 2025.

A court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.

Notice ID: TDWxxxxx

Confirmation Code: xxxxx

A \$2 million settlement has been reached in a class action lawsuit against The Daily Wire, LLC (“Defendant”). The class action lawsuit alleges Defendant disclosed its subscribers’ personally identifiable information (“PII”) to Facebook, without consent of subscribers, in violation of the Video Privacy Protection Act (“VPPA”). Defendant denies that it violated any law but has agreed to the Settlement to avoid the uncertainties and expenses associated with continuing the lawsuit.

Am I a Settlement Class Member? The Defendant’s records indicate you are likely a Settlement Class Member. You are included in the Settlement Class if during March 11, 2022, through November 7, 2023, in the United States, you (i) were a log-in account holder and/or digital newsletter subscriber to a Daily Wire Website and (ii) accessed a video through a Daily Wire Website while a pixel was operational as to video. For purposes of this Settlement, “a pixel” is a type of coding for a website that works as an analytics tool to measure actions people take on a website, here while accessing a video through a Daily Wire Website. Daily Wire Websites include, but are not limited to, www.dailywire.com.

What Can I Get? If you are a Settlement Class Members, you can file a Claim Form to receive up to \$15.00. The payment may be reduced pro rata (a legal term meaning equal share) depending on the number of valid Claims filed.

How Do I Get a Payment? If you are a Settlement Class Member and you want to receive a payment you **must** complete and submit a Claim Form postmarked or submitted online by **September 8, 2025**. You can file a claim by clicking [here](#) or going to the website www.dwvppasettlement.com. You may also visit the website and print out and file a paper claim by mail.

What Are My Other Options? You may exclude yourself from the Settlement Class by sending a letter to the Settlement Administrator postmarked by **September 1, 2025**. If you exclude yourself, you cannot get a settlement payment, but you will keep any rights you may have against the Defendant regarding the issues in the lawsuit. You may object to the proposed settlement, and you and/or your lawyer have the right to appear before the court. Your written objection must be filed no later than **September 1, 2025**. Specific instructions about how to exclude yourself from, or object to, the Settlement are available [here](#). If you file a claim or do nothing, and the court approves the Settlement, you will be bound by all of the court’s orders and judgments. In addition, your claims against the Defendant relating to legal issues in this lawsuit will be released.

Who Represents Me? The court has appointed lawyers Gary M. Klinger of Milberg, Coleman, Bryson, Phillips, Grossman PLLC and L. Timothy Fisher of Bursor & Fisher, P.A., to represent the Settlement Class. These lawyers are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer in this lawsuit, you may hire one at your expense.

When Will the Court Consider the Proposed Settlement? The court will hold the Final Approval Hearing at 9:45 a.m. on October 22, 2025, in Courtroom 14165 at the 17th Judicial Circuit Court of Florida, 201 SE 6th Street, Ft Lauderdale, Fl. 33301. The Final Approval Hearing will also be available via Zoom at <https://17thflcourts.zoom.us/j/647324402>. The purpose of the hearing will be for the court to determine whether to approve the Settlement as fair, reasonable, adequate, and in the best interests of the Settlement Class; to consider the Class Counsel's request for attorneys' fees and expenses; and to consider the request for a Service Award to the Class Representative. At that hearing, the court will be available to hear any objections and arguments concerning the fairness of the Settlement.

How Do I Get More Information? For more information, including the full Notice, Claim Form, and Settlement Agreement, go [here](#), contact the Settlement Administrator at 1-888-486-4161 or write to Daily Wire VPPA Settlement, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT'S CLERK OFFICE
REGARDING THIS NOTICE.**

<https://www.dwvppasettlement.com/submit-claim?uuid=51216de9-f964-4f34-b6d3-a763f1c5cf10>

Exhibit B

Subject: LAST REMINDER - NOTICE OF PROPOSED CLASS ACTION SETTLEMENT
From: DWVPPA Settlement Administrator <DoNotReply@DWVPPASettlement.com>

NOTICE OF PROPOSED CLASS ACTION SETTLEMENT
Circuit Court of the 17th Judicial Circuit, in and for Broward County, Florida
***Wade v. The Daily Wire, LLC.*, Case No. CACE-24-003886**

Our records indicate you may be entitled to a payment from a class action settlement because you were a log-in account holder to a Daily Wire website such as www.dailywire.com.

Click [HERE](#) To File A Claim.

Claims Must be Submitted no later than September 8, 2025.

A court authorized this Notice. You are not being sued. This is not a solicitation from a lawyer.

Notice ID: TDWxxxxx

Confirmation Code: xxxxx

A \$2 million settlement has been reached in a class action lawsuit against The Daily Wire, LLC (“Defendant”). The class action lawsuit alleges Defendant disclosed its subscribers’ personally identifiable information (“PII”) to Facebook, without consent of subscribers, in violation of the Video Privacy Protection Act (“VPPA”). Defendant denies that it violated any law but has agreed to the Settlement to avoid the uncertainties and expenses associated with continuing the lawsuit.

Am I a Settlement Class Member? The Defendant’s records indicate you are likely a Settlement Class Member. You are included in the Settlement Class if during March 11, 2022, through November 7, 2023, in the United States, you (i) were a log-in account holder and/or digital newsletter subscriber to a Daily Wire Website and (ii) accessed a video through a Daily Wire Website while a pixel was operational as to video. For purposes of this Settlement, “a pixel” is a type of coding for a website that works as an analytics tool to measure actions people take on a website, here while accessing a video through a Daily Wire Website. Daily Wire Websites include, but are not limited to, www.dailywire.com.

What Can I Get? If you are a Settlement Class Members, you can file a Claim Form to receive up to \$15.00. The payment may be reduced pro rata (a legal term meaning equal share) depending on the number of valid Claims filed.

How Do I Get a Payment? If you are a Settlement Class Member and you want to receive a payment you **must** complete and submit a Claim Form postmarked or submitted online by **September 8, 2025**. You can file a claim by clicking [here](#) or going to the website www.dwvppasettlement.com. You may also visit the website and print out and file a paper claim by mail.

What Are My Other Options? You may exclude yourself from the Settlement Class by sending a letter to the Settlement Administrator postmarked by **September 1, 2025**. If you exclude yourself, you cannot get a settlement payment, but you will keep any rights you may have against the Defendant regarding the issues in the lawsuit. You may object to the proposed settlement, and you and/or your lawyer have the right to appear before the court. Your written objection must be filed no later than **September 1, 2025**. Specific instructions about how to exclude yourself from, or object to, the Settlement are available [here](#). If you file a claim or do nothing, and the court approves the Settlement, you will be bound by all of the court’s orders and judgments. In addition, your claims against the Defendant relating to legal issues in this lawsuit will be released.

Who Represents Me? The court has appointed lawyers Gary M. Klinger of Milberg, Coleman, Bryson, Phillips, Grossman PLLC and L. Timothy Fisher of Bursor & Fisher, P.A., to represent the Settlement Class. These lawyers are called Class Counsel. You will not be charged for these lawyers. If you want to be represented by your own lawyer in this lawsuit, you may hire one at your expense.

When Will the Court Consider the Proposed Settlement? The court will hold the Final Approval Hearing at 9:45 a.m. on October 22, 2025, in Courtroom 14165 at the 17th Judicial Circuit Court of Florida, 201 SE 6th Street, Ft Lauderdale, Fl. 33301. The Final Approval Hearing will also be available via Zoom at <https://17thflcourts.zoom.us/j/647324402>. The purpose of the hearing will be for the court to determine whether to approve the Settlement as fair, reasonable, adequate, and in the best interests of the Settlement Class; to consider the Class Counsel's request for attorneys' fees and expenses; and to consider the request for a Service Award to the Class Representative. At that hearing, the court will be available to hear any objections and arguments concerning the fairness of the Settlement.

How Do I Get More Information? For more information, including the full Notice, Claim Form, and Settlement Agreement, go [here](#), contact the Settlement Administrator at 1-888-486-4161 or write to Daily Wire VPPA Settlement, 1650 Arch Street, Suite 2210, Philadelphia, PA 19103.

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT'S CLERK OFFICE
REGARDING THIS NOTICE.**

Exhibit C

If you were a log-in account holder and/or digital newsletter subscriber to a Daily Wire Website and accessed a video through a Daily Wire Website while a pixel was operational as to video, you may be entitled to a payment from a class action settlement.

A court authorized this notice. You are not being sued. This is not a solicitation from a lawyer.

- A \$2 million settlement has been reached in a class action lawsuit against The Daily Wire, LLC (“Daily Wire” or “Defendant”). The class action lawsuit alleges Defendant disclosed its subscribers’ personally identifiable information (“PII”) to Facebook, without consent of subscribers, in violation of the Video Privacy Protection Act (“VPPA”). Defendant denies that it violated any law, but has agreed to the Settlement to avoid the additional expense and distraction of litigation.
- You are included in the Settlement Class if during March 11, 2022, through November 7, 2023, in the United States, you (i) were a log-in account holder and/or digital newsletter subscriber to a Daily Wire Website and (ii) accessed a video through a Daily Wire Website while a pixel was operational as to video. For purposes of this Settlement, “a pixel” is a type of coding for a website that works as an analytics tool to measure actions people take on a website, here while accessing a video through a Daily Wire Website. Daily Wire Websites include, but are not limited to, www.dailywire.com.
- Settlement Class Members who file a valid Claim Form can receive a cash payment of up to \$15.00. The cash payment may be reduced pro rata (a legal term meaning equal share) depending on the number of valid Claims filed.
- Read this notice carefully. Your legal rights are affected whether you act, or do not act.

YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT	
Submit a Claim Form by September 8, 2025	This is the only way to receive a cash payment. A Claim Form is available at www.DWVPPASETTLEMENT.com . As a Settlement Class Member, you will give up your right to sue Defendant in the future regarding the legal claims in this lawsuit.
Exclude Yourself by September 1, 2025	You will receive no cash payment but you will retain any rights you currently have to sue Defendant regarding the legal claims in this lawsuit.
Object by September 1, 2025	Write to the court explaining why you don’t like the Settlement.
Go to the Hearing on October 22, 2025	Ask to speak in court about your opinion of the Settlement.
Do Nothing	You will not receive a cash payment and you will give up your rights to sue Defendant regarding the legal claims in this lawsuit.

Your rights and options—and the deadlines to exercise them—are explained in this Notice.

Questions? Visit www.DWVPPASETTLEMENT.com or call 1-888-486-4161

BASIC INFORMATION

1. Why was this Notice issued?

A court authorized this Notice because you have a right to know about a proposed Settlement of this class action lawsuit and about all your options before the court decides whether to give final approval to the Settlement. This Notice explains the lawsuit, the Settlement, and your legal rights.

The Honorable Keathan B. Frink, of the Circuit Court of the 17th Judicial Circuit, in and for Broward County, Florida, is overseeing this lawsuit. The lawsuit is called *Wade v. The Daily Wire, LLC.*, Case No. CACE-24-003886. The person who has sued is called the Plaintiff. The entity being sued, Daily Wire, is called the Defendant.

2. What is a class action?

In a class action, one or more people called the class representative (in this case, Plaintiffs James Wade and Michael Chavarria) sue on behalf of a group or a “class” of people who have similar legal claims. In a class action, the court resolves the issues for all class members, except for those who exclude themselves from the class.

3. What is this lawsuit about?

This lawsuit alleges that Defendant violated the Video Privacy Protection Act, 18 U.S.C. § 2710, *et seq.* (“VPPA”) by disclosing its subscribers’ personally identifiable information (“PII”) to Facebook without permission. The VPPA defines PII to include information which identifies a person as having requested or obtained specific video materials or services from a video tape service provider. Defendant denies that it violated any law. The court has not decided who is right. Rather, the parties have agreed to settle the lawsuit to avoid the uncertainties and expenses associated with ongoing litigation.

4. Why is there a Settlement?

The court has not decided whether the Plaintiffs or Defendant should win this lawsuit. Instead, both the Plaintiffs and Defendant have agreed to a Settlement. The Plaintiffs and the lawyers for the Settlement Class (“Class Counsel”) believe the Settlement is best for all Settlement Class Members because of the benefits of the Settlement and the risks and uncertainty associated with continued litigation.

WHO’S INCLUDED IN THE SETTLEMENT?

5. How do I know if I am in the Settlement Class?

The Settlement Class is defined as:

All persons who during the Class Period in the United States, (i) were log-in account holders and/or digital newsletter subscribers to a Daily Wire Website and (ii) accessed a video through a Daily Wire Website while a pixel was operational as to video.

A “Daily Wire Website” is defined as Daily Wire websites or web applications, including, but not limited to, www.dailywire.com.

The “Class Period” is from March 11, 2022, through November 7, 2023.

For purposes of this Settlement, “a pixel” is a type of coding for a website that works as an analytics tool to measure actions people take on a website, here while accessing a video through a Daily Wire

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Website.

6. Are there exceptions to being included in the Settlement?

Yes. Excluded from the Settlement Class are (1) any Judge or Magistrate presiding over this Action and members of their families; (2) the Defendant, its subsidiaries, parent companies, successors, predecessors, and any entity in which the Defendant or its parents have a controlling interest and their current or former officers, directors, agents, attorneys, and employees; (3) persons who properly execute and file a timely request for exclusion from the class; and (4) the legal representatives, successors or assigns of any such excluded persons.

7. What if I am still not sure whether I am part of the Settlement?

If you are still not sure whether you are a Settlement Class Member, you may go to the Settlement Website at www.DWVPPASettlement.com or call the Settlement Administrator toll-free at 1-888-486-4161.

THE SETTLEMENT BENEFITS

8. What does the Settlement provide?

Cash Payment

Settlement Class Members who file a valid Claim Form can receive a cash payment of up to \$15.00.

9. How will the amount of the cash payment be determined?

According to the Settlement Agreement, a \$2 million Settlement Fund will be used to pay for the following: (1) Notice and Other Settlement Administration Expenses (2) the Fee Award for attorneys' fees, costs, and expenses for Class Counsel, as may be approved by the court; (3) a Service Award to the Class Representative; and (4) up to an \$15.00 cash payment to each Settlement Class Member who submits a valid Claim. The \$15.00 cash payment may be reduced pro rata (a legal term meaning equal share) if the total value of all Approved Claims exceeds the funds available for distribution to Settlement Class Members depending on the number of valid Claims received.

10. How do I get a payment?

If you are a Settlement Class Member and you want to receive a payment, you **must** complete and submit a Claim Form postmarked or submitted online by September 8, 2025. Claim Forms can be submitted online at www.DWVPPASETTLEMENT.com, or by printing and mailing a paper Claim Form, copies of which are available for download at www.DWVPPASETTLEMENT.com.

Settlement Class Members are encouraged to submit their claim online.

11. When will I get my payment?

The court will hold a hearing to consider the fairness of the Settlement. If the court approves the Settlement, eligible Settlement Class Members whose claims are approved by the Settlement Administrator will receive their payment after the Settlement is finally approved and/or any appeals process is complete.

REMAINING IN THE SETTLEMENT

Questions? Visit www.DWVPPASETTLEMENT.com or call 1-888-486-4161

12. What am I giving up if I stay in the Settlement Class?

If the Settlement becomes final, you will give up (or “release”) your rights to sue Defendant and Released Parties regarding the Released Claims, which are described and defined in paragraphs 1.24 - 1.26, and described in paragraph 3 of the Settlement Agreement. Unless you exclude yourself, you will release the Released Claims, regardless of whether you submit a Claim Form or not. You may review the Settlement Agreement on the Settlement Website at www.dvwppasettlement.com.

The Settlement Agreement describes the Released Claims in necessary legal terminology, so please read this information carefully. If you have any questions you may speak to Class Counsel for free or you may speak to your own lawyer at your own expense.

If you remain in the Settlement Class, you will be bound by all of the court’s orders and judgments.

13. What happens if I do nothing at all?

If you do nothing, you will not receive a cash payment. Also, if you do not exclude yourself, you will be unable to start a lawsuit or be part of any other lawsuit brought against Defendant regarding the Released Claims in this lawsuit.

THE LAWYERS REPRESENTING YOU

14. Do I have a lawyer in the case?

The court has appointed Gary M. Klinger of Milberg, Coleman, Bryson, Phillips, Grossman PLLC and L. Timothy Fisher of Bursor and Fisher, P.A., to be the lawyers representing the Settlement Class. They are called “Class Counsel.” After conducting an extensive investigation, they believe the Settlement Agreement is fair, reasonable, and in the best interests of the Settlement Class. You will not be charged for the lawyers. If you want to be represented by your own lawyer in this case, you may hire one at your own expense.

15. How will the lawyers be paid?

Class Counsel’s attorneys’ fees, costs, and expenses will be paid from the Settlement Fund in an amount determined and awarded by the court. Class Counsel will ask for no more than \$666,666.67 (one-third of the \$2 million Settlement Fund), but the court may award less than this amount.

Class Counsel may also seek a Service Award of up to \$5,000 for the Class Representative for their service in helping to bring and settle the case. The Service Award will be paid out of the Settlement Fund, but the court may award less than this amount.

EXCLUDING YOURSELF FROM THE SETTLEMENT

16. How do I get out of the Settlement?

To exclude yourself from the Class, you must mail or otherwise deliver a written request stating that you want to be excluded. Your letter must include:

- Your name;
- Your address;
- Your signature;
- The name and number of the case (*Wade and Chavarria v. The Daily Wire, LLC.*, Case No

Questions? Visit www.DWPPASETLEMENT.com or call 1-888-486-4161

CACE-24-003886); and

- A statement that you wish to be excluded from the Settlement Class for the purposes of this Settlement.

You must mail or deliver your exclusion letter, **postmarked or received by September 1, 2025** to:

Daily Wire VPPA Settlement
Attn: Exclusions
P.O. Box 58220
Philadelphia, PA 19102

No “mass” or “class” opt-outs will be allowed.

17. If I don’t exclude myself, can I sue the Defendant for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Defendant for the Released Claims being resolved by this Settlement.

18. If I exclude myself, can I get anything from this Settlement?

No. If you exclude yourself, you may not submit a Claim Form to receive a cash payment.

OBJECTING TO THE SETTLEMENT

19. How do I object to the Settlement?

If you are a Settlement Class Member, you may comment upon and/or object to the Settlement Agreement or any of its terms. If you choose to make an objection, you must mail or file with the court your written objection stating that you object to the Settlement Agreement. Your written objection must include:

- Your name and address;
- An explanation of the basis upon which you claim to be a Settlement Class Member;
- All grounds for your objection, including all citations to legal authority and evidence supporting the objection;
- The name and contact information of any and all lawyers representing, advising, or in any way assisting you in connection with the preparation or submission of the objection or who may profit from the pursuit of the objection (the “Objecting Lawyers”); and
- A statement indicating whether you intend to appear at the Final Approval Hearing (either personally or through a lawyer who files an appearance with the court in compliance with the Local Rules of the court).
- If you or any of the Objecting Lawyers have objected to any class action settlement where you or the Objecting Lawyers asked for or received any payment in exchange for dismissal of the objection, or any related appeal, without any modification to the settlement, then the objection must include a statement identifying each such case by full case caption and amount of payment received. Any challenge to the Settlement Agreement, the Final Order, or the Final Judgment will be pursuant to appeal under the applicable rules of appellate procedure and not through a collateral attack.

You must mail or deliver your written objection, so that it is **received** no later than **September 1,**

Questions? Visit www.DWPPASETTLEMENT.com or call 1-888-486-4161

2025, to:

Clerk of the Court
Circuit Court of the 17th Judicial Circuit, in and for Broward County, Florida
201 SE 6th Street
Fort Lauderdale, Florida 33301

You must also mail or otherwise deliver a copy of your written objection to Class Counsel and Defendant’s counsel at the following addresses:

Class Counsel	Defendant’s Counsel
<p>Gary M. Klinger gklinger@milberg.com MILBERG COLEMAN BRYSON PHILLIPS GROSSMAN PLLC 227 W. Monroe Street, Suite 2100 Chicago, IL 60606</p> <p>Timothy Fisher ltfisher@bursor.com BURSOR & FISHER, P.A. 1990 North California Blvd., 9th Floor Walnut Creek, CA 94596</p>	<p>Joel Griswold jcgriswold@bakerlaw.com BAKER & HOSTETLER LLP One North Wacker Drive, Suite 3700 Chicago, IL 60606</p>

No “mass” or “class” objections will be allowed.

Objections will be considered by the court at the Final Approval Hearing only if, on or before the Objection Deadline, the Person making the objection files a notice of an intention to do so and at the same time (a) files copies of such papers he or she proposes to be submitted at the Final Approval Hearing with the Clerk of the court, or alternatively, if the objection is from a Class Member represented by counsel, files any objection through the court’s E-Filing Portal, and (b) sends copies of such papers by mail, hand, or overnight delivery service to Class Counsel and Defendant’s Counsel.

20. What is the difference between objecting and excluding myself from the Settlement?

Objecting simply means telling the court that you do not like something about the Settlement. You can object only if you stay in the Settlement Class. Excluding yourself from the Settlement Class is telling the court that you do not want to be part of the Settlement Class. If you exclude yourself, you have no right to object or file a Claim Form because the lawsuit no longer affects you.

THE COURT’S FINAL APPROVAL HEARING

21. When and where will the court decide whether to approve the Settlement?

The court will hold a Final Approval Hearing at **9:45 a.m. on October 22, 2025**, in Courtroom 14165 at the 17th Judicial Circuit Court of Florida, 201 SE 6th Street, Ft Lauderdale, FL 33301. The Final Approval Hearing will also be available via Zoom at <https://17thflcourts.zoom.us/j/647324402>. The purpose of the hearing will be for the court to determine whether to approve the Settlement as fair, reasonable, adequate, and in the best interests of the Settlement Class; to consider the Class Counsel’s request for attorneys’ fees and expenses; and to consider the request for a Service Award to the Class Representative. At that hearing, the court will be available to hear any objections and arguments

Questions? Visit www.DWPPASETLEMENT.com or call 1-888-486-4161

concerning the fairness of the Settlement.

The hearing may be postponed to a different date or time without notice, so it is a good idea to check www.dwvppasettlement.com or call 1-888-486-4161 to confirm the date and time. If, however, you timely objected to the Settlement and advised the court that you intend to appear and speak at the Final Approval Hearing, you will receive notice of any change in the date of the Final Approval Hearing.

22. Do I have to attend the hearing?

No. Class Counsel will answer any questions the court may have. You are welcome to attend at your own expense. If you send an objection or comment, you do not have to attend the hearing to talk about it. If you file and mail your written objection on time, the court will consider it. You may also hire your own lawyer (at your own expense) to attend the hearing, but it is not required.

23. May I speak at the hearing?

Yes. You may ask the court for permission to speak at the Final Approval Hearing. If you objected to the Settlement and intend to appear at the Final Approval Hearing (at your own expense and either with or without counsel), you must file notice of an intention to appear with the Clerk of the court and at the same time file copies of any papers you propose to be submitted at the Final Approval Hearing. Alternatively, if you object and are represented by your own lawyer, you may file your objection and intend to appear at the Final Approval Hearing through the court's E-Filing Portal, and send copies of your papers by mail or otherwise deliver to Class Counsel and Defendant's Counsel.

GETTING MORE INFORMATION

24. Where do I get more information?

This Notice summarizes the Settlement. More details are provided in the Settlement Agreement. The Settlement Agreement and other related documents are available at www.dwvppasettlement.com, by calling toll-free 1-888-486-4161, or by writing to:

Daily Wire VPPA Settlement
1650 Arch St
Suite 2210
Philadelphia, PA 19102

**PLEASE DO NOT TELEPHONE THE COURT OR THE COURT'S CLERK OFFICE
REGARDING THIS NOTICE.**

Questions? Visit www.DWVPPASETTLEMENT.com or call 1-888-486-4161

Exhibit D

Your claim must be submitted online or postmarked by: September 8, 2025

Wade v. The Daily Wire, LLC.
Case No. CACE-24-003886
In the Circuit Court of the 17th Judicial Circuit, in and for Broward County, Florida

TDW CLAIM

CLAIM FORM

Settlement Claim Form

If you are a Settlement Class Member and wish to receive a cash payment, your completed Claim Form must be postmarked on or before September 8, 2025, or submitted online on or before September 8, 2025.

Please read the full Notice of this settlement (available at www.DWVPPASettlement.com) carefully before filling out this Claim Form.

To be eligible to receive any benefits from the settlement obtained in this class action lawsuit, you must submit this completed Claim Form online or by mail:

- ONLINE:** www.DWVPPASettlement.com
- MAIL:** Daily Wire VPPA Settlement
Administrator 1650 Arch Street, Suite
2210
Philadelphia, PA19103

PART ONE: CLAIMANT INFORMATION

Provide your name and contact information below. It is your responsibility to notify the Settlement Administrator of any changes to your contact information after the submission of your Claim Form.

FIRST NAME	MI	LAST NAME
<input type="text"/>	<input type="text"/>	<input type="text"/>
STREET ADDRESS		
<input type="text"/>		
CITY	STATE	ZIP CODE
<input type="text"/>	<input type="text"/>	<input type="text"/>
COUNTRY		
<input type="text"/>		
EMAIL ADDRESS		
<input type="text"/>		
PHONE NUMBER		
<input type="text"/> - <input type="text"/> - <input type="text"/>		

If you received notice about the Settlement by email, please provide the Notice ID located on the Notice you received to assist the Settlement Administrator in validating your claim. Please be sure to include the full Notice ID, including all letters and/or numbers that appear.

NOTICE ID

Exhibit E

Exclusion #	Name	Postmarked Date
1	ARI TRACHTENBERG	7/18/2025
2	NANCY BURSTEIN	7/22/2025
3	THOMAS SOICH	7/20/2025
4	THOMAS COLLINS	7/21/2025
5	KEVIN HECKMAN	8/16/2025
6	MACKENZIE CLAIR	8/21/2025
7	PAUL BOYER	8/5/2025
8	KRISTY MARETT	9/1/2025
9	KATHRYN HAGMAN	9/2/2025
10	ERIC WETZEL	7/21/2025
11	GENEVIEVE BERGESON	9/2/2025
12	RILEY BYRD	9/2/2025
13	ASHLEY BUMGARNER	8/30/2025
14	DUSTIN BROWN	8/30/2025