

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

LISA HILL-GREEN, <i>on behalf of</i> <i>herself and all others similarly situated,</i>	:	
	:	
Plaintiff,	:	Civil Action No. 3:19-cv-708
	:	
v.	:	
	:	
EXPERIAN INFORMATION SOLUTIONS, INC.,	:	
	:	
Defendant.	:	

NOTICE

Per this Court’s September 29, 2022 Order Preliminarily Approving Settlement and Directing Notice to Classes (ECF No. 129 ¶ 21), Plaintiff files the attached declarations of Shannon R. Wheatman, Ph.D and Gretchen Eoff regarding the class notices.

Respectfully submitted,
LISA HILL-GREEN

By: /s/ Kristi C. Kelly
Kristi C. Kelly, VSB #72791
Andrew J. Guzzo, VSB #82170
Casey S. Nash, VSB #84261
J. Patrick McNichol, VSB No. 92699
KELLY GUZZO PLC
3925 Chain Bridge Road, Suite 202
Fairfax, Virginia 22030
Telephone: (703) 424-7572
Facsimile: (703) 591-0167
Email: kkelly@kellyguzzo.com
Email: aguzzo@kellyguzzo.com
Email: casey@kellyguzzo.com
Email: pat@kellyguzzo.com

Leonard A. Bennett, VSB No. 37523
Craig C. Marchiando VSB No. 89736
**CONSUMER LITIGATION ASSOCIATES,
P.C.**

763 J. Clyde Morris Blvd., Suite 1-A
Newport News, VA 23601
Telephone: (757) 930-3660
Facsimile: (757) 930-3662
Email: lenbennett@clalegal.com
Email: craig@clalegal.com

E. Michelle Drake, Admitted *Pro Hac Vice*
Email: emdrake@bm.net
Joseph C. Hashmall, Admitted *Pro Hac Vice*
Email: jhashmall@bm.net

BERGER MONTAGUE PC
1229 Tyler St NE, Suite 205
Minneapolis, Minnesota 55413
Telephone: (612) 594-5999
Facsimile: (612) 584-4470

Counsel for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

LISA HILL-GREEN,

Plaintiff,

v.

Civil Action No. 3:19-cv-00708

EXPERIAN INFORMATION SERVICES, LLC

Defendant.

**DECLARATION OF SHANNON R. WHEATMAN, PH.D. ON IMPLEMENTATION OF
THE RULE 23(B)(2) NOTICE PROGRAM**

I, Shannon R. Wheatman, being duly sworn, hereby declare as follows:

1. I was the president of Kinsella Media, LLC (“KM”) during the implementation of this notice program. KM is a nationally recognized advertising and legal notification firm in Washington, D.C. specializing in the design and implementation of notification programs to reach unidentified putative class members, primarily in consumer and antitrust class actions, and claimants in bankruptcy and mass tort litigation. I am currently a senior advisor with The Messina Group, a consulting firm. My business address is 1155 Connecticut Ave NW, Washington, DC 20036. My telephone number is (202) 969-6550.

2. I submit this declaration in connection with the above lawsuit, *Hill-Green v. Experian Information Solutions, Inc.* My credentials were previously submitted to the Court in the *Declaration of Shannon R. Wheatman, Ph.D. on Adequacy of the Notice Program*, filed on November 22, 2021.

3. Previously, I submitted the *Declaration of Shannon R. Wheatman, Ph.D. on Adequacy of the Notice Program*, filed on August 19, 2022, to describe the notices and notice program for the Rule 23(b)(2) Settlement Class (“Notice Program”). The Court approved the

Notice Program on September 29, 2022. This declaration describes the implementation of the Notice Program.

4. This declaration is based upon my personal knowledge and upon information provided by Class Counsel, Defense Counsel, and my associates and staff.

Paid Media Notice

5. To reach potential Class Members, a paid media program was implemented using print, digital, and social media.¹

6. The Publication Notice provided important information regarding the subject of the litigation, the Class definition, and the legal rights available to Class Members, and directed readers to the Settlement website to find more information. The Publication Notice appeared once in the national consumer magazine *TV Guide*. An example of the publication notice as it appeared in print is attached as **Exhibit 1**.

7. In addition, KM used national online advertising to provide potential Class Members with additional notice opportunities beyond the print placement. Banner advertisements were designed to alert potential Class Members to the Settlement using a bold message and graphic. This simple message enabled potential Class Members to quickly determine if they might be affected by the Settlement. When visitors clicked on the banner advertisement, they were sent directly to the Settlement website. Samples of the banner advertisements as they appeared on several websites are attached as **Exhibit 2**.

¹ The Notice Program approved by the Court included Google AdWords search engine advertising. Google refused to run any search ads that included the term “Experian”. KM reallocated the advertising budget for Google AdWords to Google banner ads which did include the term “Experian”.

8. Banner and/or text advertisements appeared on the three online networks, Conversant, Facebook, and Google, between October 24, 2022, and December 5, 2022. The advertisements ran across the networks and delivered 203,312,009 total gross impressions.²

9. An additional 4,892,824 gross impressions were also delivered using the following targeting strategies: third-party targeting to reach people who purchased services indicating someone was looking to protect, repair, and/or check one's credit (e.g., Experian, Equifax, Transunion, LifeLock, and Quizzle); and Facebook targeting to users who indicated an interest in pages related to credit history, credit, credit solutions, credit counseling, credit karma, debits and credits, tax lien, and others.

PERFORMANCE AND EFFECTIVENESS OF NOTICE PROGRAM

10. ***The Notice reached Class Members.*** The Notice Program, as implemented, reached³ approximately 75% of potential Class Members using a methodology that is consistent with many nationwide court-approved class action notice programs.

11. ***Notices were Designed to increase noticeability and comprehension.*** The Court-approved Notices were designed to get Class Members' attention by including a bold and informative headline. After the Notices caught the interest of the Class Members, it was critical that they could understand the content. All of the Notices were written in concise, plain language. No important or required information was missing or omitted.

² *Gross impressions* are the total number of times a form of media containing the Notice is seen. This figure does not represent the total number of unique viewers of the Notice, as some viewers/readers will see the Notice in more than one media vehicle.

³ *Reach* is the estimated percentage of a target audience reached through a specific media vehicle or combination of media vehicles.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Souderton,
PA this 12th day of January 2023.

Shannon Wheatman

Shannon R. Wheatman, Ph.D.

EXHIBIT 1

Santa Bootcamp

MOVIE PREMIERE 8/7c, Lifetime

She calls herself “just a sassy old lady with an opinion who runs a Santa camp.” But Belle (Oscar winner Rita Moreno, below, with John Schuck as hubby Chris) is much more in this Yuletide rom-com. She’s a matchmaker to an event planner (Emily Kinney) and a chef (Justin Gaston) and a magical being—wink!—who can pull off multiple bedazzled red tracksuits!



The Wizard of Oz

★★★★

6:30/5:30c, TNT

Movie Picks

It’s our annual viewing! A teenage farm girl

with the sweetest voice (Judy Garland) gets a knock on the head and awakens in a world awash with wonder and color in the 1939 classic.

Life in Color

SERIES PREMIERE

8/7c, BBC America

Learn how color helps animals win mates, scare enemies and fight rivals. Cue battling red frogs!

Three Wise Men and a Baby

MOVIE PREMIERE

8/7c, Hallmark Channel

Three brothers (network favorites Andrew Walker,

Paul Campbell and Tyler Hynes) must care for a child over the holidays. How did no one think of that title sooner?!

Pit Bulls & Parolees

9/8c, Animal Planet

As the long-running dog rescue show continues its final season, Tia Torres and daughter-in-law Lizzy are inspired to train their hounds as scent trackers to find lost pets. And another abandoned pup is saved.

TODAY'S SPORTS PICK

COLLEGE FOOTBALL

2:30/1:30c, NBC

Boston College at Notre Dame

The Fighting Irish have won the last eight games in the “Holy War” series.

MOVIES

7am/6c Hook (1991)
Freeform ★★☆☆

8:49am/Big Fish (2003)
7:49c Starz Edge
★★★☆☆

9am/8c King Kong (2005) Syfy
★★★★☆

9:30am/Spider-Man: Into the Spider-Verse (2018) FX
8:30c
★★★★☆

10:25am/While We're Young (2014)
9:25c HBO Zone ★★☆☆

11am/10c Pitch Perfect (2012) USA
★★★★☆

Noon/Coal Miner's Daughter (1980)
11am c CMT ★★★★★

Noon/Love and Death on Long Island (1997) This TV
11am c
★★★★☆

12:30/While You Were Sleeping (1995)
11:30am c Pop TV ★★☆☆

1:52/12:52c Ever After (1998)
Retroplex ★★☆☆

2:15/1:15c Salt (2010) IFC
★★★★☆

2:30/1:30c Charlie and the Chocolate Factory (2005)
TBS ★★☆☆

4:22/3:22c 22 Jump Street (2014) Starz
Comedy ★★☆☆

5/4c Goodfellas (1990)
AMC ★★★★★

6/5c Pure Country (1992) CMT
★★★★☆

8/7c The Bourne Legacy (2012)
AMC ★★☆☆

10/9c Support Your Local Gunfighter (1971)
Grit ★★☆☆



Coal Miner's Daughter

Consumers With High-Risk or Non-Residential Addresses on Experian Credit Reports

Could Be Affected by a Class Action Settlement

An expanded Settlement has been reached in a class action lawsuit that claims that Experian reported inaccurate information about some consumers' addresses through its Fraud Shield product. Experian denies it did anything wrong.

Are you included?

You are included if, between September 27, 2017 and the present, Experian sent your consumer report to a third party with an inaccurate Fraud Shield Indicator showing your address was either a high-risk or non-residential address. This may have impacted your ability to obtain credit.

What does the Expanded Settlement provide?

There is no money available, but Experian will change its business practices in how it discloses and handles disputes about certain Fraud Shield Indicators. Experian also agreed to pay for notice and administration costs. A separate settlement provides money for consumers who were harmed by how Experian reported certain Fraud Shield Indicators.

What are my rights?

If the Court approves this Settlement, you will be bound by the Court's decision. You will give up certain rights to sue Experian, including for the type of class-action claims made in this lawsuit, related to Experian's reporting of your address as a high-risk or non-residential address. You will keep your right to file an individual lawsuit for claims that arose before the Settlement became effective. You may object to the Settlement by **January 30, 2023**. The Court will hold a hearing on **March 1, 2023**, to consider whether to approve the Settlement. You or your lawyer may appear and speak at the hearing at your own expense.

For More Information:

1-877-917-0074

FraudShieldSettlement.com

EXHIBIT 2

300x250 – Yahoo! News

YAHOO!
NEWS

Search

Sign in

Comment

Reblog

Share

Tweet

Share

In the news

The Canadian Press 14 Comments



Three stories in the news for Friday, July 5 — — **TRUDEAU SHOOTS BACK AT CHINA'S 'NAIVE' CLAIM** Justin Trudeau says U.S. President Donald Trump did make good on his pledge to raise the plight of the two Canadians imprisoned in China with President Xi Jinping. The prime minister says Trump raised the [More](#)

TRUDEAU SHOOTS BACK AT CHINA'S 'NAIVE' CLAIM

Justin Trudeau says U.S. President Donald Trump did make good on his pledge to raise the

Did Experian say your address was high-risk or non-residential when providing your credit report?

You May be Affected by a Settlement

LEARN MORE >

www.FraudShieldSettlement.com

What to Read Next



Trudeau defends judicial appointments with personal connections to Dominic LeBlanc

CBC



The Genius Keto Diet of 2019 Has Hit The Market

728x90 – Politico

☰

POLITICO

[MAGAZINE](#)
[THE AGENDA](#)
[PRO](#)
🔍

Did Experian say your address was high-risk or non-residential when providing your credit report?
You May be Affected by a Settlement



LEARN MORE ▶

www.FraudShieldSettlement.com

○ QUICK POPS

- 1h **Biden warns 'there will be no NATO' if Trump wins re-election**
- U.S. adds robust 224,000 jobs in June
- Biden: I 'wasn't prepared' for Harris's attack in debate
- ▶ **Buttigieg responds to South Bend question: 'Racism is not going to help us'**

SPONSORED CONTENT

What the U.S. Outlook for

○ TOP NEWS

Reeling O'Rourke seeks a way forward

The Texan's boosters think organization and a moment could turn the campaign around. 'Things can change on a dime,' says one strategist.

BY DAVID SIDERS

MAGAZINE

Why America Needs A New Mount Rushmore

We asked historians to imagine a new national monument for 21st-century America.

BY POLITICO MAGAZINE



How fake news could lead to real

EDUCATION NEWS SIMULATOR YOUR MONEY ADVISORS ACADEMY 

What Is Consumer Credit? Definition, Advantages and Disadvantages

By [JULIA KAGAN](#) Updated May 17, 2021
Reviewed by [THOMAS BROCK](#)

What Is Consumer Credit?

Consumer credit is personal debt taken on to purchase goods and services. A credit card is one form of consumer credit.

Although any type of personal loan could be labeled consumer credit, the term is more often used to describe unsecured debt that is taken on to buy everyday goods and services. However, consumer debt can also include collateralized consumer loans like mortgage and car loans.

Consumer credit is also known as [consumer debt](#).

Table of Contents

- What Is Consumer Credit?
- Understanding Consumer Credit
- Special Considerations

Advertisement



Did Experian say your address was high-risk or non-residential when providing your credit report?

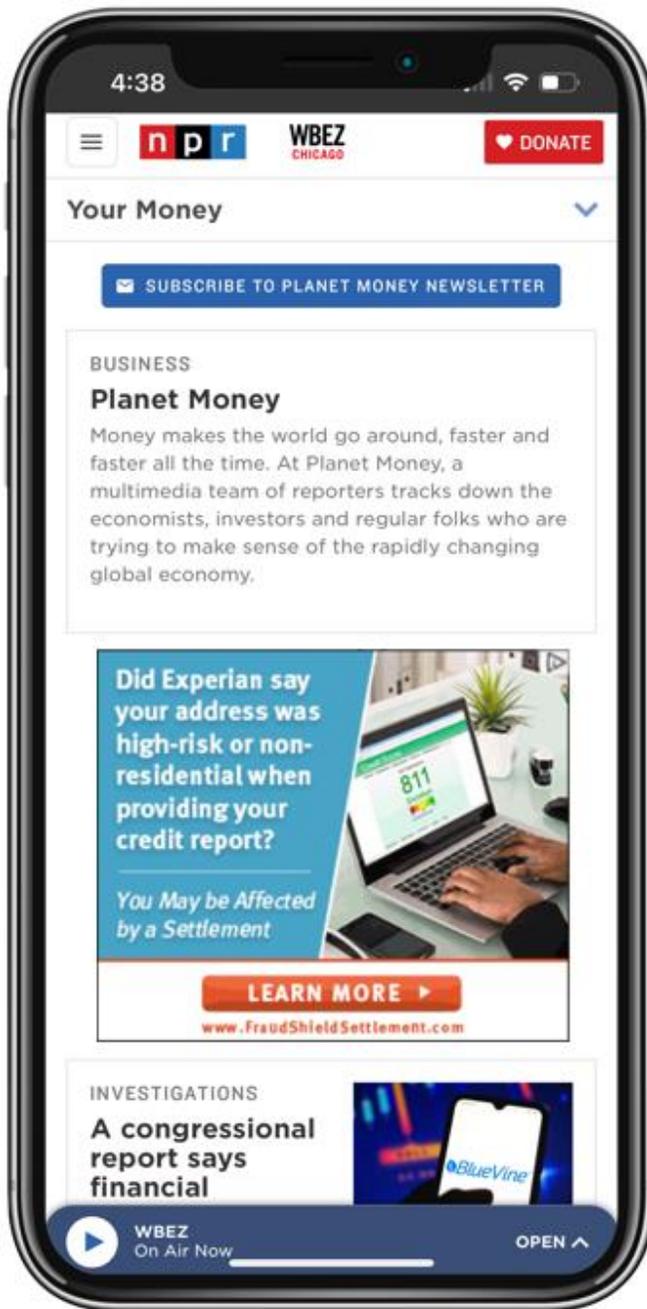
You May be Affected by a Settlement

[LEARN MORE](#)

www.FraudShieldSettlement.com

KEY TAKEAWAYS

- Installment credit is used for a specific purpose and is issued for a set



Health > Fitness

7 Best Protein Powders for Women, According to a Registered Dietitian

These options are ideal for promoting female muscle gain.

GH | BY JACLYN LONDON, M.S., R.D., C.D.N. AND STEFANI SASSOS, M.S., R.D.N., C.S.O., C.D.N., NASM-CPT Updated: Nov 22, 2022



We updated this article in November 2022 to ensure all top picks are in stock and include current pricing (note that price per serving is calculated based on price at time of publication). Our picks were updated to reflect new testing results.

Did you know that protein is present in every cell in the body? This essential nutrient is critical for building, maintaining and even repairing muscle. It also plays a role in supporting enzymes and hormones to keep the body functioning properly. Eating real, whole ingredients to up your protein intake (particularly eggs, seafood, beef, poultry,

Did Experian say your address was high-risk or non-residential when providing your credit report?

You May be Affected by a Settlement

LEARN MORE ▶

www.FryeShieldSettlement.com

ADVERTISEMENT

Did Experian say your address was high-risk or non-residential when providing your credit report? You May be Affected by a Settlement



www.FraudShieldSettlement.com

RD.COM → Holidays & Observances → Christmas

31 Unique Gifts for People Who Are Impossible to Shop For

 **Bryce Gruber**
Updated: Dec. 02, 2022



Totally stumped? Don't worry—we've got tons of unique gift ideas that even the most complicated people on your list are sure to love.

Sponsored By: *GiftTree*
A portion of this piece was created in partnership with GiftTree, a gift basket retailer that delights in turning ordinary gifting moments into extraordinary ones.

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Say hello to a smarter way to travel.

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA**

LISA HILL-GREEN,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC.,

Defendant.

CIVIL ACTION NO. 3:19-cv-00708-MHL

**DECLARATION OF GRETCHEN EOFF
REGARDING NOTICE PROGRAM AND
SETTLEMENT ADMINISTRATION**

I, Gretchen Eoff, declare as follows:

1. I am a Senior Vice President of Operations of JND Legal Administration LLC (“JND”). This Declaration is based on my personal knowledge and information provided to me by Counsel and experienced JND employees and, if called upon to do so, I could and would testify competently thereto.

2. JND is serving as the Settlement Administrator for the Rule 23(b)(3) Settlement in the above-captioned litigation (“Settlement”) for the purpose of administering the Settlement Agreement and Release, filed August 23, 2022, ECF No. 127-1 (“Settlement Agreement”) approved in the Court’s Order Preliminarily Approving Settlement and Directing Notice to Classes, filed September 29, 2022, ECF No. 129 (“Preliminary Approval Order”).

3. JND previously filed a Declaration Regarding Proposed Notice Program for the Rule 23(b) Settlement Class, filed August 19, 2022, ECF No. 126-5. This Declaration is being filed to update the Court regarding Class Notice per Paragraph 21 of the Preliminary Approval Order.

CAFA NOTICE

1
2 4. On August 29, 2022, and in compliance with the Class Action Fairness Act (“CAFA”),
3 28 U.S.C. § 1715, JND compiled a CD-ROM containing the following documents (with an
4 accompanying cover letter and attachment of recipients):

- 5 a. Complaint;
6 b. Motion for Preliminary Approval of Class Action Settlement; and
7 c. Plaintiff’s Memorandum in Support of Motion for Preliminary Approval of
8 Class Action Settlement (with Exhibits).
9

10 5. A true and correct copy of the CAFA Notice and list of recipients is attached hereto as
11 Exhibit A.

12
13 **RULE 23(B)(2) CLASS SETTLEMENT WEBSITE**

14
15 6. Pursuant to section 4.2.4 of the Settlement Agreement, on October 21, 2022, JND
16 established an informational Settlement website (“Rule 23(b)(2) Class Settlement Website”),
17 www.FraudShieldSettlement.com/irs that allows Rule 23(b)(2) Settlement Class Members to learn
18 more about the case and proposed Settlement. The “Home” page provides a summary of the proposed
19 Settlement, key dates, and an overview of legal rights and options. An “Important Documents” page
20 provides downloadable PDF copies of important Court documents, including the Settlement
21 Agreement and Long Form Notice. The “FAQ” page provides answers to frequently asked questions.
22 There are also separate “Key Dates” and “Contact Class Counsel” pages detailing how Class Counsel
23 can be reached by email, toll-free telephone, and mail. Pursuant to Section 4.2.4 of the Settlement
24 Agreement, the website also includes a “Notificación en Español” page that provides the Spanish
25 language version of the Rule 23(b)(2) Long Form Notice.
26
27
28

RULE 23(B)(3) CLASS SETTLEMENT WEBSITE

1
2 7. Pursuant to section 5.2.4 of the Settlement Agreement, on October 21, 2022, JND
3 established an informational Settlement website (“Rule 23(b)(3) Class Settlement Website”),
4 www.FraudShieldSettlement.com/ds that allows Rule 23(b)(3) Settlement Class Members to learn
5 more about the case and proposed Settlement. The “Home” page provides a summary of the proposed
6 Settlement, key dates, and an overview of legal rights and options. The “File a Claim” page allows
7 Class Members to file a Claim Form through the January 30, 2023 claims deadline. An “Important
8 Documents” page provides downloadable PDF copies of important Court documents, including the
9 Settlement Agreement, Long Form Notice, and Claim Forms. The “FAQ” page provides answers to
10 frequently asked questions. There are also separate “Key Dates” and “Contact Us” pages detailing
11 how JND can be reached by email, toll-free telephone, and mail. Pursuant to Section 5.2.4a of the
12 Settlement Agreement, the Rule 23(b)(3) Class Settlement Website is available in both English and
13 Spanish.
14
15

TOLL-FREE INFORMATION LINE

16
17
18 8. On October 21, 2022, JND established a Settlement-specific dedicated toll-free
19 Interactive Voice Response (“IVR”) number, 1-877-917-0074, for Class Members to call for
20 additional information. The IVR provides information for both Rule 23(b)(2) Settlement Class
21 Members and Rule 23(b)(3) Settlement Class Members and provides Rule 23(b)(3) Settlement Class
22 Members with the option to speak with a live representative.
23

24 9. As of January 5, 2023, JND has received 8,511 calls to the IVR. Of these, 1,639 callers
25 spoke to a live representative. JND will continue to maintain the toll-free IVR number and assist the
26 Settlement Class throughout the Settlement Administration process.
27
28

RULE 23(B)3 CLASS LIST DATA TRANSFER

1
2 10. Pursuant to Section 5.2.1 of the Settlement Agreement, on October 20, 2022, JND
3 received a data file containing 20,259 records that Defendant communicated contained the name, PIN
4 number, and mailing address of the dispute members of the Rule 23(b)(3) Settlement Class. On
5 October 31, 2022, JND received a data file containing 549,721 records that Defendant communicated
6 contained the name, PIN number, mailing address, and Fraud Shield Indicator (“FSI”) address for the
7 non-dispute members of the Rule 23(b)(3) Settlement Class. JND analyzed the data and removed
8 1,321 duplicates based on exact name and PIN number. Accordingly, 568,659 unique Rule 23(b)(3)
9 Settlement Class Members were identified based on exact name and PIN number. Of the 568,659
10 unique members, 549,569 were non-dispute members and 19,090 were dispute members.

11
12 11. JND updated Notice List mailing address information using data from the National
13 Change of Address (NCOA) database.¹ JND then loaded the Notice List data into a dedicated
14 database for this Settlement.
15

DIRECT EMAIL NOTICE

16
17 12. Per Section 5.2.4a of the Settlement Agreement, on November 14, 2022, JND
18 commenced dissemination by electronic mail of the Court-approved summarized version of the
19 Settlement Notice (“Email Notice”) to 1,253,173 Rule 23(b)(3) Settlement Class Member email
20 address(es). Of those, 1,202,364 addresses were for non-dispute members and 50,809 were for
21 dispute members. Email addresses were obtained through an advanced level address search of Rule
22 23(b)(3) Settlement Class Members. Email Notice was issued to all email addresses located through
23
24

25 _____
26 ¹ The NCOA database is the official United States Postal Service (“USPS”) technology product which
27 makes change of address information available to mailers to help reduce undeliverable mail pieces
28 before mail enters the mail stream. This product is an effective tool to update address changes when a
person has completed a change of address form with the USPS. The address information is maintained
in the database for 48 months.

1 this search. Multiple email addresses were located for many Rule 23(b)(3) Settlement Class
2 Members. Because some of these multiple email addresses were old or inactive, the deliverability
3 result as detailed in Paragraph 13 below is a higher than normal number of undeliverable emails. A
4 copy of the Email Notice for the dispute and non-dispute Rule 23(b)(3) Settlement Class Members
5 are attached hereto as Exhibits B and C, respectively.

6 13. Of the 1,202,364 non-dispute Rule 23(b)(3) Settlement Class Member email addresses
7 sent Email Notices, 788,248 or 66% were deemed delivered and 414,116 or 34% were deemed
8 undeliverable.
9

10 14. Of the 50,809 dispute Rule 23(b)(3) Settlement Class Member email addresses sent
11 Email Notices, 32,537 or 64% were deemed delivered and 18,272 or 36% were deemed undeliverable.

12 **DIRECT MAIL NOTICE**

13
14 15. Per Section 5.2.4a of the Settlement Agreement, on November 14, 2022, JND mailed
15 a summarized version of the Settlement Notice (“Postcard Notice”) by USPS First Class Mail, postage
16 pre-paid, to 568,659 Rule 23(b)(3) Settlement Class Members on the Notice List. As indicated in
17 Paragraph 11 above, JND updated Notice List mailing address information using NCOA database
18 information prior to the Postcard Notice mailing. Of those, 19,090 mailing addresses were for dispute
19 Rule 23(b)(3) Settlement Class Members, and 549,569 mailing addresses were for non-dispute Rule
20 23(b)(3) Settlement Class Members. A copy of the Postcard Notice for the dispute and non-dispute
21 Rule 23(b)(3) Settlement Class Members are attached hereto as Exhibits D and E, respectively.
22

23 16. As of January 5, 2023, 25,998 Postcard Notices have been returned to JND as
24 undeliverable with no forwarding address. JND re-mailed 20 Postcard Notices to an updated address
25 provided by the USPS, and 6,641 Postcard Notices were forwarded by the USPS. In addition, JND
26 performed advanced address research for the 25,509 undeliverable Postcard Notices without a USPS
27 updated address or forward, and re-mailed 13,575 Postcard Notices to an updated address.
28

1 17. As of January 5, 2023, of the 568,659 Rule 23(b)(3) Postcard Notices sent, 556,236 or
2 98% were deemed delivered and 12,423 or 2% were deemed undeliverable.

3 **DIRECT EMAIL AND MAIL CLAIM REMINDER NOTICE**

4
5 18. Pursuant to paragraph 5.2.4a of the Settlement Agreement, JND commenced a claim
6 reminder campaign by email and mail to Rule 23(b)(3) Settlement Class Members on January 10,
7 2023, including 783,067 email addresses and 546,398 mailing addresses. A copy of the Email
8 Reminder Notice and the Postcard Reminder Notice for the dispute and non-dispute Rule 23(b)(3)
9 Settlement Class Members are attached hereto as Exhibits F, G, and H, respectively.

10
11 **OBJECTIONS**

12 19. Pursuant to Section 5.4 of the Settlement Agreement, the Email Notice, Postcard
13 Notice, Long Form Notice, and Rule 23(b)(3) Class Settlement Website informed Rule 23(b)(3)
14 Settlement Class Members that those who wanted to object to the Settlement could do so by January
15 30, 2023.

16
17 20. As of January 5, 2023, JND is not aware of any Settlement objections.

18 **EXCLUSION REQUESTS**

19
20 21. Pursuant to Section 5.3.1 of the Settlement Agreement, the Email Notice, Postcard
21 Notice, Long Form Notice, and Rule 23(b)(3) Class Settlement Website informed Rule 23(b)(3) Class
22 Members that those who wanted to be excluded from the Settlement could do so by February 13,
23 2023.

24 22. As of January 5, 2023, JND has received 4 timely and valid exclusion requests and 3
25 invalid exclusion requests. Lists of the valid and invalid exclusion requests are attached hereto as
26 Exhibits I and J, respectively.

CLAIMS

1
2 23. The Email Notice, Postcard Notice, Long Form Notice, and Rule 23(b)(3) Class
3 Settlement Website informed Rule 23(b)(3) Settlement Class Members that a Claim must be
4 submitted to receive a Settlement payment and that all Claims must be received online through the
5 Settlement Website or postmarked by mail by January 30, 2023.

6
7 24. As of January 5, 2023, JND has received 35,363 timely Claims for non-dispute Rule
8 23(b)(3) Settlement Class Members (21,479 online and 13,884 by mail) and 1,504 timely Claims for
9 dispute Rule 23(b)(3) Settlement Class Members (959 online and 545 by mail). In total, JND has
10 received 36,867 timely Claims (22,438 online and 14,429 by mail).

11 25. JND is continuing to receive and process all Claims to confirm eligibility and Claim
12 deficiencies, perform quality assurance procedures, conduct de-duplication, and solicit feedback from
13 the parties. As the Claim deadline has not yet passed and JND’s claim validation is not complete, this
14 Claim summary is preliminary and subject to change.

15
16 26. JND will continue to administer the Settlement through all phases of Settlement
17 Administration, as required by the Settlement Agreement, Preliminary Approval Order, and pursuant
18 to any future Orders of this Court.

19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct.

21 Executed on January 12, 2023 in Seattle, Washington.

22
23 

24 _____
25 GRETCHEN EOFF

EXHIBIT A



August 29, 2022

United States Attorney General
and the Appropriate Officials
Identified in Attachment A

Re: CAFA Notice of Proposed Class Action Settlement

Dear Sir or Madam:

This Notice is being provided to you in accordance with the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1715, on behalf of Experian Information Solutions, Inc., the Defendant in the below-referenced class action ("the Action"). Plaintiffs' Motion for Preliminary Approval of Class Action Settlement was filed with the Court on August 19, 2022. As of the date of this notice, the Court has not yet scheduled a preliminary approval hearing.

Case Name: *Hill-Green v. Experian Information Solutions, Inc.*
Case Number: 3:19-cv-708-MHL
Jurisdiction: United States District Court for the Eastern District of Virginia
Date Settlement filed with Court: August 19, 2022

Copies of all materials filed in the above-named actions are electronically available on the Court's PACER website found at <https://ecf.vaed.uscourts.gov/cgi-bin/ShowIndex.pl>. Additionally, in compliance with 28 U.S.C. § 1715(b), the enclosed CD-ROM contains the following documents filed in the Action:

01 – Complaint .pdf

[Class Action] Complaint filed 09/27/2019 (ECF No. 1)

02 – Motion for Preliminary Approval of Class Action Settlement .pdf

Plaintiff's Motion for Preliminary Approval of Class Settlement filed 08/19/2022 (ECF No. 125), attaching:

1. Exhibit 1: Settlement Agreement and Release. (Please note that included with this notice is ECF No. 127-1, a corrected version of the Settlement Agreement and Release filed shortly after the original version.)

03 – Plaintiff's Memorandum in Support of Motion for Preliminary Approval of Class Action Settlement.pdf

Plaintiff's Memorandum in Support of Motion for Preliminary Approval of Class Settlement filed 08/19/2022 (ECF No. 126), attaching:

1. Exhibit 1: Declaration of Kristi C. Kelly;
2. Exhibit 2: Declaration of Leonard A. Bennett In Support of Plaintiffs' Motion For Preliminary Approval of Class Action Settlement;
3. Exhibit 3: Declaration of E. Michelle Drake In Support of Motion For Preliminary Approval (with Exhibits A and B);
4. Exhibit 4 : Declaration of Shannon R. Wheatman, Ph.D. On Adequacy of the Notice Program; and

5. Exhibit 5: Declaration of Jennifer M. Keough On Proposed Notice Program for the Rule 23(B)(3) Settlement Class.

Because the exact number of individuals in the Fed. R. Civ. P. 23(b)(2) Settlement Class is not known at this time, it is not feasible for Experian to provide a reasonable estimate of the number of class members residing in each State. Nevertheless, Experian can profess a good-faith belief that the number of Settlement Class Members residing in any particular state roughly corresponds to each state's share of the U.S. population. Attached as Exhibit B is a breakdown of the Fed. R. Civ. P. 23(b)(3) Settlement Class in accordance with 28 U.S.C. § 1715(b)(7). We estimate the Fed. R. Civ. P. 23(b)(3) Settlement Class is approximately 549,348 individuals.

If you have any questions regarding the details of the case and Settlement, please contact Defense Counsel's representative at:

Daniel J. McLoon
Kerry C. Fowler
JONES DAY
555 S. Flower St., Fiftieth Floor
Los Angeles, CA 90071
T: 213.243.2580
E: djmcloon@jonesday.com

For questions regarding this Notice, please contact JND at:

JND Class Action Administration
1100 2nd Ave, Suite 300
Seattle, WA 98101
Phone: 1-800-207-7160

Regards,

JND Legal Administration

Enclosures

CAFA Notice - Attachment A - Service List

Merrick Garland
Office of the U.S. Attorney General
U.S. Department of Justice
950 Pennsylvania Ave NW
Washington, DC 20530

Treg R. Taylor
Office of the Attorney General
1031 W 4th Ave
Ste 200
Anchorage, AK 99501

Steve Marshall
Attorney General's Office
501 Washington Ave
Montgomery, AL 36104

Leslie Rutledge
Office of the Attorney General
323 Center St
Ste 200
Little Rock, AR 72201

Mark Brnovich
Office of the Attorney General
2005 N Central Ave
Phoenix, AZ 85004

CAFA Coordinator
Office of the Attorney General
Consumer Protection Section
455 Golden Gate Ave., Ste 11000
San Francisco, CA 94102

Phil Weiser
Office of the Attorney General
Ralph L. Carr Judicial Building
1300 Broadway, 10th Fl
Denver, CO 80203

William Tong
Office of the Attorney General
165 Capitol Ave
Hartford, CT 06106

Karl A. Racine
Office of the Attorney General
400 6th St NW
Washington, DC 20001

Kathy Jennings
Delaware Department of Justice
Carvel State Office Building
820 N French Street
Wilmington, DE 19801

Ashley Moody
Office of the Attorney General
State of Florida
PL-01 The Capitol
Tallahassee, FL 32399

Chris Carr
Office of the Attorney General
40 Capitol Sq SW
Atlanta, GA 30334

Holly T. Shikada
Department of the Attorney General
425 Queen Street
Honolulu, HI 96813

Thomas J. Miller
Office of the Attorney General
Hoover State Office Building
1305 E. Walnut Street Rm 109
Des Moines, IA 50319

CAFA Notice - Attachment A - Service List

Lawrence G. Wasden
Office of the Attorney General
700 W. Jefferson St, Suite 210
Boise, ID 83720

Kwame Raoul
Office of the Attorney General
James R. Thompson Center
100 W. Randolph St
Chicago, IL 60601

Todd Rokita
Office of the Attorney General
Indiana Government Center South
302 W Washington St 5th Fl
Indianapolis, IN 46204

Derek Schmidt
Office of the Attorney General
120 SW 10th Ave
2nd Fl
Topeka, KS 66612

Daniel Cameron
Office of the Attorney General
Capitol Building
700 Capitol Ave Ste 118
Frankfort, KY 40601

Jeff Landry
Office of the Attorney General
1885 N. Third St
Baton Rouge, LA 70802

CAFA Coordinator
General Counsel's Office
Office of Attorney General
One Ashburton Pl, 20th Floor
Boston, MA 02108

Brian E. Frosh
Office of the Attorney General
200 St. Paul Pl
Baltimore, MD 21202

Aaron Frey
Office of the Attorney General
6 State House Station
Augusta, ME 04333

Dana Nessel
Department of Attorney General
G. Mennen Williams Building, 7th Fl
525 W Ottawa St
Lansing, MI 48933

Keith Ellison
Office of the Attorney General
445 Minnesota St
Suite 1400
St. Paul, MN 55101

Eric Schmitt
Attorney General's Office
Supreme Court Building
207 W High St
Jefferson City, MO 65101

Lynn Fitch
Office of the Attorney General
Walter Sillers Building
550 High St Ste 1200
Jackson, MS 39201

Austin Knudsen
Office of the Attorney General
Justice Building, Third Fl
215 N. Sanders
Helena, MT 59601

CAFA Notice - Attachment A - Service List

Josh Stein
Attorney General's Office
114 W Edenton St
Raleigh, NC 27603

Drew H. Wrigley
Office of the Attorney General
State Capitol, 600 E Boulevard Ave
Dept. 125
Bismarck, ND 58505

Doug Peterson
Attorney General's Office
2115 State Capitol
Lincoln, NE 68509

John Formella
Office of the Attorney General
NH Department of Justice
33 Capitol St.
Concord, NH 03301

Matthew J. Platkin
Office of the Attorney General
Richard J. Hughes Justice Complex
25 Market St 8th Fl, West Wing
Trenton, NJ 08611

Hector Balderas
Office of the Attorney General
Villagra Building
408 Galisteo Street
Santa Fe, NM 87501

Aaron Ford
Office of the Attorney General
Old Supreme Court Building
100 N Carson St
Carson City, NV 89701

CAFA Coordinator
Office of the Attorney General
28 Liberty St
15th Fl
New York, NY 10005

Dave Yost
Attorney General's Office
State Office Tower
30 E Broad St 14th Fl
Columbus, OH 43215

John O'Connor
Office of the Attorney General
313 NE 21st St
Oklahoma City, OK 73105

Ellen F. Rosenblum
Oregon Department of Justice
Justice Building
1162 Court St NE
Salem, OR 97301

Josh Shapiro
PA Office of the Attorney General
Strawberry Square 16th Fl
Harrisburg, PA 17120

Peter F. Neronha
Office of the Attorney General
150 S Main St
Providence, RI 02903

Alan Wilson
Office of the Attorney General
Rembert C. Dennis Bldg
1000 Assembly St Rm 519
Columbia, SC 29201

CAFA Notice - Attachment A - Service List

Mark Vargo
Office of the Attorney General
1302 E Highway 14
Ste 1
Pierre, SD 57501

Herbert H. Slatery, III
Office of the Attorney General
500 Dr Martin L King Jr Blvd
Nashville, TN 37219

Ken Paxton
Office of the Attorney General
300 W. 15th St
Austin, TX 78701

Sean D. Reyes
Office of the Attorney General
Utah State Capitol Complex
350 North State St Ste 230
Salt Lake City, UT 84114

Jason S. Miyares
Office of the Attorney General
202 N. Ninth St.
Richmond, VA 23219

Susanne Young
Attorney General's Office
109 State St.
Montpelier, VT 05609

Bob Ferguson
Office of the Attorney General
1125 Washington St SE
Olympia, WA 98501

Josh Kaul
Attorney General's Office
P.O. Box 7857
Madison, WI 53707

Patrick Morrissey
Office of The Attorney General
State Capitol, 1900 Kanawha Blvd E
Building 1 Rm E-26
Charleston, WV 25305

Bridget Hill
Office of the Attorney General
State Capitol Building
200 W 24th St
Cheyenne, WY 82002

Fainu'uolelei Falefatu Ala'ilima-Utu
Department of Legal Affairs
Exec Ofc Bldg, 3rd Fl
P.O. Box 7
Utulei, AS 96799

Leevin Taitano Camacho
Office of the Attorney General
Administration Division
590 S Marine Corps Dr, Suite 901
Tamuning, GU 96913

Edward Manibusan
Office of the Attorney General
Administration Building
P.O. Box 10007
Saipan, MP 96950

Domingo Emanuelli Hernández
Dpto. de Justicia de Puerto Rico
Calle Teniente César González 677
Esq. Ave. Jesús T. Piñero
San Juan, PR 00918

CAFA Notice - Attachment A - Service List

Denise N. George
Office of the Attorney General
3438 Kronprindsens Gade
GERS Building 2nd Fl
St. Thomas, VI 00802

Joses R. Gallen
Department of Justice
P.O. Box PS-105
Palikir
Pohnpei State, FM 96941

Richard Hickson, Attorney General
C/O Marshall Islands Embassy
2433 Massachusetts Ave NW
Washington, DC 20008

Ernestine K. Rengiil
Office of the Attorney General
P.O. Box 1365
Koror, PW 96940

EXHIBIT B

From: info@fraudshieldsettlement.com
Sent: Monday, November 14, 2022 11:09 AM
To: [REDACTED]
Subject: Notice of Experian Credit Reports Settlement

Security Notice: This email originated outside of JND. Use caution when clicking links or opening attachments.

Dear [REDACTED]:

**Consumers Affected by High-Risk or Non-Residential
Addresses on
Experian Credit Reports**

Could Get Money from a Class Action Settlement

YOUR NOTICE ID:	[REDACTED]
YOUR CONFIRMATION CODE:	[REDACTED]
PLEASE SAVE THIS NUMBER TO FILE A CLAIM	

Para una notificación en Español, llamar 1-877-917-0074 o visitar www.FraudShieldSettlement.com

You are receiving this notice because you may be a Class member in a proposed class action settlement.

What's this Case About? The lawsuit claims that Experian reported inaccurate information about some consumers' addresses through its Fraud Shield product. Experian denies it did anything wrong.

Am I Included? Based on Experian's records, you have been identified as a Settlement Class Member because between July 1, 2018 and July 31, 2021, you submitted a dispute or inquiry to Experian regarding a non-residential or high-risk address indicator.

What does the Settlement Provide? The Settlement establishes a \$22,450,000 Settlement Fund for payments to Eligible Class Members after payments of attorneys' fees and expenses (not to exceed one third of the Settlement Fund), the Class Representative service payment of \$10,000, and administrative and notice costs. The Parties estimate you could receive between \$300 and \$900, but this is just an estimate and is not guaranteed. The Settlement also establishes substantial and comprehensive changes to Defendant's business practices that will benefit all Class Members.

How Do I Get a Payment? You must submit a valid claim form attesting to the nature of your dispute and that you were harmed by **January 30, 2023**.

FILE A CLAIM

Your Other Rights. Even if you do nothing, you will be bound by the Court's decision. If you want to keep your right to sue Experian yourself, you must exclude yourself from the Settlement by **February 13, 2023**. If you stay in the Settlement but do not agree with the terms, you may object to it by **January 30, 2023**.

The Court will hold a hearing on **March 1, 2023** to consider whether to approve the Settlement, a request for attorneys' fees and expenses, and service payments. You or your lawyer may appear and speak at the hearing at your own expense.

For more information: Call 1-877-917-0074 or visit www.FraudShieldSettlement.com

To unsubscribe, please click on the following link: [unsubscribe](#)

EXHIBIT C

From: info@fraudshieldsettlement.com
Sent: Monday, November 14, 2022 11:09 AM
To: [REDACTED]
Subject: Notice of Experian Credit Reports Settlement

Security Notice: This email originated outside of JND. Use caution when clicking links or opening attachments.

Dear [REDACTED]:

**Consumers Affected by High-Risk or Non-Residential
Addresses on
Experian Credit Reports**

Could Get Money from a Class Action Settlement

YOUR NOTICE ID:	[REDACTED]
YOUR CONFIRMATION CODE:	[REDACTED]
PLEASE SAVE THIS NUMBER TO FILE A CLAIM	

Para una notificación en Español, llamar 1-877-917-0074 o visitar www.FraudShieldSettlement.com

You are receiving this notice because you may be a Class member in a proposed class action settlement.

What's this Case About? The lawsuit claims that Experian reported inaccurate information about some consumers' addresses through its Fraud Shield product. Experian denies it did anything wrong.

Am I Included? Based on Experian's records, you have been identified as a Settlement Class Member because you may have been affected by Experian's reporting of certain Fraud Shield Indicators from July 1, 2018 through July 31, 2021. Experian reported the following address on your report as non-residential: [REDACTED]

What does the Settlement Provide? The Settlement establishes a \$22,450,000 Settlement Fund for payments to eligible Class Members after payment of attorneys' fees and expenses (not to exceed one-third of the Settlement Fund), the Class Representative service payment of \$10,000, and administrative and notice costs. The Parties estimate you could receive between \$300 and \$900, but that is just an estimate and not guaranteed. The Settlement also establishes substantial and comprehensive changes to Experian's business practices that will benefit all Class Members.

How Do I Get a Payment? You must submit a valid claim form by **January 30, 2023**.

FILE A CLAIM

Your Other Rights. Even if you do nothing, you will be bound by the Court's decision. If you want to keep your right to sue Experian yourself, you must exclude yourself from the Settlement by **February 13, 2023**. If you stay in the Settlement but do not agree with the terms, you may object to it by **January 30, 2023**.

The Court will hold a hearing on **March 1, 2023** to consider whether to approve the Settlement, a request for attorneys' fees and expenses, and service payments. You or your lawyer may appear and speak at the hearing at your own expense.

For more information: Call 1-877-917-0074 or visit www.FraudShieldSettlement.com

To unsubscribe, please click on the following link: [unsubscribe](#)

EXHIBIT D

**Consumers Affected by High-Risk or
Non-Residential Addresses on
Experian Credit Reports**

***Could Get Money from a
Class Action Settlement***

Eligible consumers could receive a payment
from a \$22,450,000 Settlement with Experian.

*Para una notificación en Español, llamar
1-877-917-0074 o visitar
www.FraudShieldSettlement.com*

Fraud Shield Settlement
c/o JND Legal Administration
P.O. Box 91215
Seattle, WA 98111

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Permit #__



Postal Service: Please do not mark barcode

Notice ID: [JND Name Number]
Confirmation Code: [Unique Confirmation Code]
[Claimant Name]
[Address Line 1]
[City], [State] [Zip Code]

What's this Case About? The lawsuit claims that Experian reported inaccurate information about some consumers' addresses through its Fraud Shield product. Experian denies it did anything wrong.

Am I Included? Based on Experian's records, you have been identified as a Settlement Class Member because between July 1, 2018 and July 31, 2021, you submitted a dispute or inquiry to Experian regarding a non-residential or high-risk address indicator.

What does the Settlement Provide? The Settlement establishes a \$22,450,000 Settlement Fund for payments to Eligible Class Members after payments of attorneys' fees and expenses (not to exceed one third of the Settlement Fund), the Class Representative service payment of \$10,000, and administrative and notice costs. The Parties estimate you could receive between \$300 and \$900, but this is just an estimate and is not guaranteed. The Settlement also establishes substantial and comprehensive changes to Defendant's business practices that will benefit all Class Members.

How Do I Get a Payment? You must submit a valid claim form attesting to the nature of your dispute and that you were harmed by **January 30, 2023**. Complete and mail in the attached claim form or file a claim online at www.FraudShieldSettlement.com.

Your Other Rights. Even if you do nothing, you will be bound by the Court's decisions. If you want to keep your right to sue Experian yourself, you must exclude yourself from the Settlement by **February 13, 2023**. If you stay in the Settlement but do not agree with the terms, you may object to it by **January 30, 2023**.

The Court will hold a hearing on **March 1, 2023** to consider whether to approve the Settlement, a request for attorneys' fees and expenses, and service payments. You or your lawyer may appear and speak at the hearing at your own expense.

For more information: Call 1-877-917-0074 or visit www.FraudShieldSettlement.com

Claim Form

Name/Address Change

To receive a payment, you must sign below and postmark your claim by January 30, 2023 or file a claim online at www.FraudShieldSettlement.com by January 30, 2023.

Please confirm the following statement by checking the box:

- I submitted a dispute to Experian about my address being reported as non-residential and I was harmed by Experian's reporting of a Fraud Shield Indicator.

I declare that the information above is correct.

Signature: _____

Name: _____

Phone Number: _____

Email: _____

SSN (last 4): _____

Your check will be sent to the same address as this postcard. To change the mailing address for your check, write the new address above or go to www.FraudShieldSettlement.com.



Fraud Shield Settlement
c/o JND Legal Administration
P.O. Box 91215
Seattle, WA 98111

EXHIBIT E

**Consumers Affected by High-Risk or
Non-Residential Addresses on
Experian Credit Reports**

***Could Get Money from a
Class Action Settlement***

Eligible consumers could receive a payment
from a \$22,450,000 Settlement with Experian.

*Para una notificación en Español, llamar
1-877-917-0074 o visitar
www.FraudShieldSettlement.com*

Fraud Shield Settlement
c/o JND Legal Administration
P.O. Box 91215
Seattle, WA 98111

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Postal Service: Please do not mark barcode

Notice ID: [JND Name Number]

Confirmation Code: [Unique Confirmation Code]

[Claimant Name]

[Address Line 1]

[City], [State] [Zip Code]

3:19-cv-00708-MPL Document 135-2 Filed 09/19/23 Page 29 of 44 PageID#
What's this Case About? The lawsuit claims that Experian reported inaccurate information about some consumers' addresses through its Fraud Shield product. Experian denies it did anything wrong.

Am I Included? Based on Experian's records, you have been identified as a Settlement Class Member because you may have been affected by Experian's reporting of certain Fraud Shield Indicators from July 1, 2018 through July 31, 2021. Experian reported the following address on your report as non-residential: [FSI Address].

What does the Settlement Provide? The Settlement establishes a \$22,450,000 Settlement Fund for payments to eligible Class Members after payment of attorneys' fees and expenses (not to exceed one-third of the Settlement Fund), the Class Representative service payment of \$10,000, and administrative and notice costs. The Parties estimate you could receive between \$300 and \$900, but that is just an estimate and not guaranteed. The Settlement also establishes substantial and comprehensive changes to Experian's business practices that will benefit all Class Members.

How Do I Get a Payment? You must submit a valid claim form by **January 30, 2023**. Complete and mail in the attached claim form or file a claim online at www.FraudShieldSettlement.com.

Your Other Rights. Even if you do nothing, you will be bound by the Court's decision. If you want to keep your right to sue Experian yourself, you must exclude yourself from the Settlement by **February 13, 2023**. If you stay in the Settlement but do not agree with the terms, you may object to it by **January 30, 2023**.

The Court will hold a hearing on **March 1, 2023** to consider whether to approve the Settlement, a request for attorneys' fees and expenses, and service payments. You or your lawyer may appear and speak at the hearing at your own expense.

For more information: Call 1-877-917-0074 or visit www.FraudShieldSettlement.com

Claim Form

Name/Address Change

To receive a payment, you must sign below and postmark your claim by January 30, 2023 or file a claim online at www.FraudShieldSettlement.com by January 30, 2023.

Experian reported the following address on your report as non-residential: [FSI Address].

Please confirm the following statement by checking the box:

- The address listed above and reported by Experian as a non-residential address is actually a residential address.

I declare that the information above is correct.

Signature: _____

Name: _____

Phone Number: _____

Email: _____

SSN (last 4): _____

Your check will be sent to the same address as this postcard. To change the mailing address for your check, write the new address above or go to www.FraudShieldSettlement.com.



Fraud Shield Settlement
c/o JND Legal Administration
P.O. Box 91215
Seattle, WA 98111

EXHIBIT F



From: info@fraudshieldsettlement.com
Sent: Tuesday, December 27, 2022 2:01 PM
To: [Redacted]
Subject: Experian Credit Reports Settlement

Security Notice: This email originated outside of JND. Use caution when clicking links or opening attachments.

Dear [Redacted]:

REMINDER NOTICE

File a Claim Now to Get a Payment from a \$22,450,000 Settlement with Experian.

YOUR NOTICE ID:	[Redacted]
YOUR CONFIRMATION CODE:	[Redacted]
PLEASE SAVE THIS NUMBER TO FILE A CLAIM	

CLAIM FILING DEADLINE IS JANUARY 30, 2023

FILE A CLAIM

You previously received notice of a Settlement in a class action lawsuit that claims Experian reported inaccurate information about some consumers' addresses through its Fraud Shield product.

This is a reminder that you must submit a Claim Form to get a payment up to \$900. If you submit a valid Claim Form, your address will also be removed from Experian's non-residential address list.

If you have already filed your Claim Form, you may disregard this email.

**For more information: Call 1-877-917-0074 or visit
www.FraudShieldSettlement.com**

To unsubscribe, please click on the following link: [unsubscribe](#)

EXHIBIT G

REMINDER NOTICE

File a Claim Now to Get a Payment from a \$22,450,000 Settlement with Experian.

Fraud Shield Settlement
c/o JND Legal Administration
P.O. Box 91215
Seattle, WA 98111



Postal Service: Please do not mark barcode

CLAIM FILING DEADLINE IS JANUARY 30, 2023

Notice ID: **[[JND Name Number]]**
Confirmation Code: **[[Unique Confirmation Code]]**

[[CLAIMANT NAME]]
[[ADDRESS LINE 1]]
[[CITY]], [[STATE]] [[ZIP CODE]]

Claim Form

Name/Address Change

To receive a payment, you must sign below and postmark your claim by January 30, 2023 or file a claim online at www.FraudShieldSettlement.com by January 30, 2023.

Please confirm the following statement by checking the box:

- I submitted a dispute to Experian about my address being reported as non-residential, and I was harmed by Experian’s reporting of a Fraud Shield Indicator.

I declare that the information above is correct.

Signature: _____

Name: _____

Phone Number: _____

Email: _____

SSN (last 4): _____

Your check will be sent to the same address as this postcard. To change the mailing address for your check, write the new address above or go to www.FraudShieldSettlement.com.

REMINDER NOTICE

You previously received notice of a Settlement in a class action lawsuit that claims Experian reported inaccurate information about some consumers' addresses through its Fraud Shield product.

This is a reminder that you must submit a Claim Form to get a payment up to \$900. If you submit a valid Claim Form, your address will also be removed from Experian's non-residential address list.

How to Get a Payment: Mail the attached claim form or file a claim online by **January 30, 2023**.

If you have already filed your Claim Form, you may disregard this notice.

For more information: Call 1-877-917-0074 or visit www.FraudShieldSettlement.com.



Fraud Shield Settlement
c/o JND Legal Administration
P.O. Box 91215
Seattle, WA 98111

EXHIBIT H

REMINDER NOTICE

File a Claim Now to Get a Payment from a \$22,450,000 Settlement with Experian.

Fraud Shield Settlement
c/o JND Legal Administration
P.O. Box 91215
Seattle, WA 98111



Postal Service: Please do not mark barcode

CLAIM FILING DEADLINE IS JANUARY 30, 2023

Notice ID: **[[JND Name Number]]**
Confirmation Code: **[[Unique Confirmation Code]]**

[[CLAIMANT NAME]]
[[ADDRESS LINE 1]]
[[CITY]], [[STATE]] [[ZIP CODE]]

Claim Form

Name/Address Change

To receive a payment, you must sign below and postmark your claim by January 30, 2023 or file a claim online at www.FraudShieldSettlement.com by January 30, 2023.

Experian reported the following address on your report as non-residential: **[[FSI ADDRESS]]**

Please confirm the following statement by checking the box:

- The address listed above and reported by Experian as a non-residential address is actually a residential address.

I declare that the information above is correct.

Signature: _____

Name: _____

Phone Number: _____

Email: _____

SSN (last 4): _____

Your check will be sent to the same address as this postcard. To change the mailing address for your check, write the new address above or go to www.FraudShieldSettlement.com.

REMINDER NOTICE

You previously received notice of a Settlement in a class action lawsuit that claims Experian reported inaccurate information about some consumers' addresses through its Fraud Shield product.

This is a reminder that you must submit a Claim Form to get a payment up to \$900. If you submit a valid Claim Form, your address will also be removed from Experian's non-residential address list.

How to Get a Payment: Mail the attached claim form or file a claim online by **January 30, 2023**.

If you have already filed your Claim Form, you may disregard this notice.

For more information: Call 1-877-917-0074 or visit www.FraudShieldSettlement.com.



Fraud Shield Settlement
c/o JND Legal Administration
P.O. Box 91215
Seattle, WA 98111

EXHIBIT I

FRAUD SHIELD SETTLEMENT
(USDC EASTERN DISTRICT OF VIRGINIA, CASE NO. 3:19-CV-708-MHL)

TIMELY AND VALID EXCLUSIONS

	<u>JND ID NUMBER</u>	<u>NAME</u>	<u>CITY/STATE</u>	<u>POSTMARK DATE</u>	<u>STATUS</u>	<u>SIGNATURE TYPE</u>	<u>LAW FIRM SUBMITTING</u>
1.	D8FY3LVTPE	JESSICA IRENE JACKSON	Grand Prairie, TX	November 23, 2022	Dispute Class	Wet	N/A
2.	DQ8YPAFLRK	ALLSIN MURRAY	Vernon, CT	December 6, 2022	Non-dispute Class	Wet	N/A
3.	D27YGLDXBP	XINYI GU	Brooklyn, NY	December 20, 2022	Non-dispute Class	Wet	N/A
4.	DZDNCR3AF9	THOMAS M WILSON	Portland, OR	December 31, 2022	Dispute Class	Wet	N/A

EXHIBIT J

FRAUD SHIELD SETTLEMENT
(USDC EASTERN DISTRICT OF VIRGINIA, CASE NO. 3:19-CV-708-MHL)

INVALID EXCLUSIONS

	<u>JND ID NUMBER</u>	<u>NAME</u>	<u>CITY/STATE</u>	<u>POSTMARK DATE</u>	<u>STATUS</u>	<u>SIGNATURE TYPE</u>	<u>LAW FIRM SUBMITTING</u>	<u>REASON DEFECTIVE</u>
1.	DUQWAYRSB8	LUCILLE DEPHILLIPS	Philadelphia, PA	November 18, 2022 (email)	Non-dispute class	None	N/A	Submitted by email; no signature; no telephone number; inadequate statement
2.	DWCY9XK7DB	LINDA NORGAARD	Pacific Grove, CA	December 5, 2022	Non-dispute class	Wet	N/A	No current address; inadequate statement
3.	DJRWW8D6FM	Ali Ratzel	Jefferson City, MO	December 5, 2022	N/A	Wet	N/A	Non-Class Member