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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

COOPER MOORE and ANDREW
GILLETTE, on their own behalf and on
behalf of others similarly situated,

Plaintiffs,

v.

ROBINHOOD FINANCIAL LLC,

Defendant.

No. 2:21-cv-01571-BJR

**SUPPLEMENTAL DECLARATION OF
GINA INTREPIDO-BOWDEN
REGARDING NOTICE PROGRAM
IMPLEMENTATION, SETTLEMENT
ADMINISTRATION, AND OPT OUT
REQUESTS**

I, Gina Intrepido-Bowden, declare and state as follows:

1. I am a Vice President at JND Legal Administration LLC (“JND”), the Court-appointed Settlement Administrator in this case. This Declaration is based on my personal knowledge, as well as upon information provided to me by knowledgeable JND employees and, if called upon to do so, I could and would testify competently thereto.

2. JND previously filed a Declaration Regarding Settlement Notice Program filed

1 February 8, 2024, Docket No. 94 (“Notice Program Declaration”)¹ and a Declaration Regarding
2 Notice Program Implementation, Settlement Administration and Opt Out Requests filed June 12,
3 2024, Docket No. 105. This Supplemental Declaration is being filed to further update the Court
4 regarding implementation of the Notice Plan and Settlement administration status.

5
6 **SETTLEMENT WEBSITE**

7 3. As of June 27, 2024, there were 1,409,366 total views of the Settlement Website pages
8 and documents and 540,197 unique visitors to the Settlement Website. JND will continue to maintain
9 the Settlement Website throughout the Settlement administration process.

10
11 **TOLL-FREE TELEPHONE NUMBER**

12 4. As of June 27, 2024, JND has received 2,881 calls to the IVR. JND will continue to
13 maintain the Settlement toll-free number throughout the Settlement administration process.

14
15 **DIRECT NOTICE**

16 5. As of July 1, 2024, 45,498 Postcard Notices were returned to JND as undeliverable.
17 JND re-mailed 17 Postcard Notices to forwarding addresses provided by the USPS.

18 6. As of July 1, 2024, of the 364,010 Postcard Notices mailed, 325,434 or 89.4% were
19 deemed delivered, and 38,576 or 10.6% were deemed undeliverable.

20 7. As of July 1, 2024, of the 1,126,513 Class Member email addresses sent Email Notice,
21 971,601 or 86.25% were deemed delivered and 154,912 or 13.75% were deemed undeliverable.

22 8. As of July 1, 2024, 96% of the 827,327 unique telephone numbers representing the
23 identified Settlement Class received at least one Email Notice or Postcard Notice.
24

25
26
27 _____
28 ¹ All capitalized terms not defined herein have the meanings given to them in the Notice Program Declaration, unless otherwise indicated.

REMINDER NOTICES

1
2 9. As of July 1, 2024, of the 324,576 Class Members sent a second Postcard Reminder
3 Notice, 323,159 or 99.6% were deemed deliverable and 1,417 or 0.4% were deemed undeliverable.
4

CLAIM FORMS

5
6 10. As of June 27, 2024, JND has received 51,543 timely Claims (47,443 filed online and
7 4,093 filed by mail).
8

9 11. As of June 27, 2024, JND has received 138 late Claims.

10 12. In total, JND has received 51,681 Claims.

CLAIM VALIDATION

11
12 13. Pursuant to Section 4.04 of the Settlement Agreement, JND reviewed all Claims for
13 validity.
14

15 14. As of June 27, 2024, there are 30,988 valid claims and 20,693 invalid claims. The total
16 number of valid and invalid claims may change based on the deficiency responses received.

17 15. Pursuant to Section 4.05 of the Settlement Agreement, beginning on June 28, 2024,
18 JND commenced issuing Deficiency Notices via email for the 20,693 invalid Claims to the email
19 addresses provided on the Claim Form. Claimants have the opportunity to respond to the Deficiency
20 Notice within fourteen (14) days from the date issued to attempt to cure any deficiencies.
21

22 16. JND will continue to administer the Settlement through all phases of Settlement
23 Administration, as required by the Settlement Agreement, Preliminary Approval Order, and pursuant
24 to any future Orders of this Court.
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26 I declare under penalty of perjury under the laws of the United States of America that the foregoing
27 is true and correct.
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Executed on July 2, 2024, in Philadelphia, Pennsylvania.



GINA INTREPIDO-BOWDEN