

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

JACKIE STONE, NERYS JONES, DAVINA
KIM, JEAN DEFOND, AND SHANE
COZWITH, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

ACCELLION USA LLC, a Washington
limited liability company; and THE OFFICE
OF THE WASHINGTON STATE AUDITOR,

Defendants.

Case No. 21-2-01439-5 SEA

**DECLARATION OF RYAN ALDRIDGE
REGARDING NOTICE AND
SETTLEMENT ADMINISTRATION**

I Ryan Aldridge, hereby declare and verify as follows:

I. INTRODUCTION

1. ***Personal Information.*** I am a Partner at EAG Gulf Coast LLC (“EAG”). EAG was retained as the Settlement Administrator in this Litigation, and, as the project manager over this Settlement, I am personally familiar with the facts set forth in this Declaration.¹

2. ***The Capacity and Basis of this Declaration and Verification.*** I am over the age of 21. Except as otherwise noted, the matters set forth in this Declaration and Verification are based upon my personal

¹ Unless otherwise indicated, all capitalized terms have the same meaning assigned to them in the Settlement Agreement. (ECF No. 53-3).

knowledge, information received from the Parties in this Litigation, and information provided by my colleagues at EAG and our Partners.

3. As the duly appointed Settlement Administrator, I verify compliance with the notice requirements contained in the Settlement Agreement, and the Court's Preliminary Approval Order.

II. BACKGROUND

4. ***Preliminary Approval.*** On June 26, 2025, the Court entered its Order preliminarily approving the Settlement Agreement and the appointment of EAG as Settlement Administrator. After the Court's preliminary approval of the Settlement, EAG began to implement and coordinate the notice program.

5. ***The Purpose of this Declaration and Verification.*** I submit this Declaration to evidence EAG's compliance with the terms of the Preliminary Approval Order, to detail EAG's execution of its role as the Settlement Administrator, and to verify compliance with the notice requirements contained in the Settlement Agreement and the Court's Preliminary Approval Order.

III. CLASS NOTICE PROGRAM EXECUTION

6. ***Notice Database.*** EAG maintains a database of 1,329,001 Settlement Class Members ("Notice List") which was used to effectuate the notice program as outlined within the Settlement Agreement. EAG received the class data on July 10, 2025 in four Excel files with a total of 1,398,976 records. After deduplicating the data, EAG determined that the Settlement Class Member population consists of 1,329,001 unique records.

7. ***Email Hygiene.*** Before sending the summary notice by email ("Email Notice"), EAG performed a hygiene and verification process designed to protect the integrity of the email campaign and maximize deliverability on the 1,318,194 email addresses provided in the Notice List. This process includes identifying and removing invalid email addresses and domains. A total of 1,273,817 email addresses passed the hygiene and verification process.

8. ***Email Notice.*** Beginning on July 26, 2025, in accordance with the Preliminary Approval Order, EAG commenced sending the Email Notice to the 1,273,817 Class Members on the Notice List with an email address that passed hygiene and verification. The Email Notice included (a) the web address to the case Settlement Website for access to additional information, and (b) rights and options as a Settlement Class Member to submit a claim or opt out or object to the Settlement and the dates by which to act on those

options. EAG followed standard email best practices, including utilizing “unsubscribe” links and providing Settlement Administrator contact information in the Email Notice. Ultimately, the Email Notice was successfully delivered to 1,173,285 Class Members. A copy of the Email Notice is attached hereto as **Exhibit A**.

9. ***Mail Notice.*** EAG coordinated and caused the Notice in the form of a postcard (“Postcard Notice”) to be mailed via First-Class Mail to Settlement Class Members for whom a valid email address was not available but a mailing address was available from the class data. The Postcard Notice included (a) the web address to the case Settlement Website for access to additional information, and (b) rights and options as a Settlement Class Member to submit a claim or opt out or object to the Settlement and the dates by which to act on those options. A true and correct copy of the Postcard Notice is attached hereto as **Exhibit B**.

10. ***Mailing Address Validation.*** Prior to the mailing, all mailing addresses were checked against the National Change of Address (NCOA) database maintained by the United States Postal Service (“USPS”). In addition, the addresses were certified via the Coding Accuracy Support System (CASS) to ensure the quality of the zip code and verified through Delivery Point Validation (DPV) to verify the accuracy of the addresses.

11. ***Mail Notice Delivery.*** In the initial mailing campaign, EAG executed mailings to 53,627 Settlement Class Members that passed address validation and a secondary mailing to 98,743 to mailing addresses of those whose email notice was unsuccessful but for whom we had a mailable USPS address. EAG also executed supplemental mailings for 8,369 Settlement Class Members for whom the initial Postcard Notice was not deliverable but for whom EAG was able to obtain an alternative mailing address through (1) forwarding addresses provided by the USPS, (2) skip trace searches using a third-party vendor database, or (3) requests received directly from Settlement Class Members. Mail notice delivery statistics are detailed in Section 16 below.

12. ***Settlement Post Office Box.*** EAG maintains the following Post Office Box for the Notice Program:

SAO Claims Administrator
PO Box 911
Baton Rouge, LA 70821

This P.O. Box serves as a location for the USPS to return undeliverable program mail to EAG and

for Settlement Class Members to submit exclusion requests, Claim Forms, and other settlement-related correspondence. The P.O. Box address appears prominently in all notices, the Claim Form, and in multiple locations on the Settlement Website. EAG monitors the P.O. Box daily and uses a dedicated mail intake team to process each item received.

13. ***Settlement Website.*** On July 25, 2025, EAG published the Settlement Website, available at www.SAOFTASettlement.com. Visitors to the Settlement Website can download the notice, the Claim Form, and other Court documents, such as the Class Action Amended Complaint, the Settlement Agreement, the Unopposed Motion for Preliminary Approval, Orders of the Court, and other relevant documents. Visitors were also able to submit claims electronically, identify important dates and deadlines, and access contact information for the Settlement Administrator. As of October 6, 2025, the Settlement Website received 71,266 unique visits.

14. ***Toll-Free Number.*** On July 25, 2025, EAG established a dedicated toll-free telephone number, 1-844-978-4141, which is available twenty-four hours per day. Settlement Class Members can call and interact with an interactive voice response (IVR) system that provides important Settlement information and offers the ability to leave a voicemail message to address specific requests or issues. EAG also provided copies of the notice, paper Claim Form, as well as the Settlement Agreement, upon request to Settlement Class Members, through the toll-free number. The toll-free number appeared in all notices, as well as in multiple locations on the Settlement Website. The toll-free number will remain active through the close of this notice program.

15. ***Email Support.*** EAG established an Email address, info@SAOFTASettlement.com, to provide an additional option for Settlement Class Members to address specific questions and requests to the Settlement Administrator for support.

IV. NOTICE PROGRAM REACH

16. ***Notice Reach Results.*** Through the Notice procedures outlined above, EAG attempted to send direct notice to 1,327,444 (99.88%) Settlement Class Members with sufficient email or mailing information

to attempt notice. As of October 6, 2025, the Notice Program reached a total of 1,299,510 (97.78%)² of Settlement Class Members.³ Table 1 below provides an overview of dissemination results for the notice program and reach statistics for the notice program.

Table 1: Direct Notice Program Dissemination & Reach		
Description	Volume of Class Members	Percentage of Class Members (%)
Class Member Database	1,329,001	100.00%
Email Notice		
(+) Total Notices E-Mailed	1,273,817	95.85%
(-) Total Undeliverable Emails	100,532	7.89%
Mail Notice		
(+) Total Notices Mailed	53,627	4.04%
(-) Total Dropped/Returned	13,022	24.28%
Supplemental Notice Mailing: Failed Emails		
(+) Total Notices Mailed	98,743	7.43%
(-) Total Dropped/Returned	21,335	21.61%
Postcard Remails		
(+) Total Unique Notices Re-Mailed	8,369	8.32%
(-) Total Dropped/Returned	157	1.88%

Direct Notice Program Reach		
Received Email Notice	1,173,285	88.28%
Received Postcard Notice	126,225	9.50%
(=) Received Direct Notice	1,299,510	97.78%

V. CLAIM ACTIVITY

17. ***Claim Intake and Processing.*** The online claim submission feature was available beginning

² The lynchpin in an objective determination of the adequacy of a proposed notice effort is whether all the notice efforts together will reach a high percentage of the class. It is reasonable to reach between 70-95%. Here, the notice effort reached nearly 98% of the Settlement Class Members. *2010 Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide (2010)*.

³ A Settlement Class Member is considered "reached" by direct Notice if a Postcard mailed to the Settlement Class Member has not been returned by the USPS as undeliverable.

July 25, 2025. As of October 6, 2025, EAG has received a total of 18,236 claims submissions, of which 17,748 claims have been determined to be non-duplicative and from Settlement Class Members. EAG will continue to intake and analyze claims postmarked by the claims filing deadline of October 24, 2025. Table 2 below provides summary statistics of claim submissions and current dispositions. If the Court awards the requested attorneys' fees, costs, service awards, and administrative costs in section VII, the estimated pro rata award as of the date of this declaration is \$99.40. EAG will provide claimants with deficiencies identified an opportunity to cure the defect. The deadline to submit claims is October 24, 2025. The estimated pro rata payment could slightly decrease depending on the volume of deficient claim forms cured, and as EAG continues to receive, review, and process claims.

Table 2: Claim Submission Summary	
Description	Count
Total Claims Submitted	18,236
(-) Invalid Claims: Not a Class Member	63
Pending Review	425
(=) Net Claims Received From Class Members	17,748

VI. EXCLUSIONS AND OBJECTIONS

18. ***Exclusions (Opt-Outs) Received.*** The deadline to submit a request for exclusion was September 24, 2025. As of October 6, 2025, EAG has received a total of Eight (8) exclusion requests from Settlement Class Members. A list of the Settlement Class Members that have requested to be excluded is attached as **Exhibit C**.

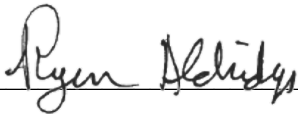
19. ***Settlement Objections.*** The deadline to object to the Settlement was September 24, 2025. EAG has received zero (0) objections from Settlement Class Members.

VII. COSTS OF ADMINISTRATION

Costs of Administration. As of October 6, 2025, EAG has incurred \$175,232.61 in costs sending notice and administering the Settlement. EAG estimated that it will incur an additional \$44,767.39 in costs for a total of \$220,000.00 in costs administering the Settlement.

VIII. CERTIFICATION

I, Ryan Aldridge, declare under the penalty of perjury under the laws of the State of Washinton that the foregoing is true and correct. Executed on this 6th day of October, 2025 at Baton Rouge, Louisiana.



Ryan Aldridge

EXHIBIT A

If your personal information was potentially compromised in a Data Security Incident that took place at the Office of the Washington State Auditor (SAO) on or around December 2020, you could get a payment from a class action Settlement.

A court ordered this notice. This is not a solicitation from a lawyer.

This notice is only a summary of the key Settlement terms. A full copy of the Settlement Agreement and Long Form Notice is available at www.SAOFTASettlement.com or by calling **1-844-978-4141**.

A proposed settlement has been reached in a class action lawsuit against the Office of the Washington State Auditor (“SAO” or “Defendant”) relating to a December 2020 Data Security Incident during which cybercriminals potentially accessed files that contained individuals’ private information. The case is known as *Stone v Accellion USA LLC, et al.*, Case No. 21-2-01439-5 SEA. The Defendant denies all claims alleged against it and denies all charges of any wrongdoing or liability. The settlement is not an admission of wrongdoing or an indication that the Defendant has violated any laws, but rather the resolution of disputed claims.

Am I included? Yes. If you received this notice, Defendant’s records indicate that your information may have been involved in the Data Security Incident.

What are the benefits? The Settlement provides compensation for the following cash payments for Settlement Class Members who submit a timely Valid Claim: (i) Compensation for Out-of-Pocket Losses and Reimbursement for Lost Time, or (ii) an Alternative Compensation. Please visit www.SAOFTASettlement.com for complete information about the Cash Benefits.

- **Out-Of-Pocket Losses:** Up to \$5,000 for documented Out-of-Pocket losses reasonably traceable to the Data Security Incident.
- **Reimbursement for Lost Time (Attested Time):** Settlement Class Members with approved Settlement Claims for Out-of-Pocket Losses may claim up to three (3) hours compensated at a rate of \$30 per hour (for a total of \$90) for time that is fairly traceable to the Data Security Incident.
- **Alternative Compensation:** Settlement Class Members who do not submit approved Settlement Claims for Out-of-Pocket Losses or Attested Time may elect to receive Alternative Compensation payments. These payments will be calculated by first deducting from the Settlement Fund claims for Out-Of-Pocket Losses, Attested Time, and all other expenses, claims, fee awards, costs, and service awards, and allocating the remainder evenly to all eligible Alternative Compensation claimants.

How do I receive a Cash Benefit? You must file a Claim Form online at www.SAOFTASettlement.com by **October 24, 2025** or by mail postmarked by **October 24, 2025** and mailed to the Claims Administrator’s address below to receive a Cash Benefit.

What are my other options? If you **do nothing** or **submit a Claim Form**, you will not be able to sue or continue to sue the Defendant about the claims resolved by this Settlement. If you **exclude yourself**, you will not receive any Cash Benefit, but you will keep your right to sue the Defendant in a separate lawsuit about the claims resolved by this Settlement. If you do not exclude yourself, you can **object** to the Settlement. The deadline to exclude yourself from the Settlement or to object to the Settlement is **September 24, 2025**.

Detailed instructions on how to file a Claim Form, exclude yourself, or object, can be found on the Long Notice found on the Settlement Website, www.SAOFTASettlement.com.

Has the Court approved the Settlement? The Court will hold the Final Fairness Hearing on **October 28, 2025, at 1:00 p.m.** at the King County Superior Courthouse, 401 4th Avenue N, Courtroom 3C, Kent, Washington 98032 to consider whether to approve the proposed Settlement as fair, reasonable, and adequate, and whether to approve an award of attorneys' fees of up to 33.33% of the Settlement Fund, reimbursement of the costs and expenses incurred in connection with the prosecution of the Action, and Service Awards of \$7,500 to the Class Representatives.

You do not need to appear at the hearing, but you may come at your own expense. The Court has appointed the law firms of Tousley Brain Stephens PLLC and Gibbs Mura LLP to represent the Settlement Class. You will not be charged for their services. If you want to be represented by your own lawyer, you may hire one at your own expense

How do I get more information? For additional information, including a copy of the Settlement Agreement, Long Notice, Claim Form, and other Court documents, visit the Documents section of the Settlement Website, www.SAOFTASettlement.com, or call 1-844-978-4141. You may also contact the Claims Administrator at *Stone v Accellion USA LLC, et al.*, PO Box 911, Baton Rouge, LA 70821.

EXHIBIT B

Legal Notice

If your personal information was potentially compromised in a Data Incident that took place at the Office of the Washington State Auditor (SAO) on or around December 2020, you could get a payment from a class action Settlement.

A court ordered this notice. This is not a solicitation from a lawyer.

This postcard is only a summary of the key Settlement terms. A full copy of the Settlement Agreement and Long Form Notice is available at www.SAOFTASettlement.com or by calling (844) 978-4141.

A proposed settlement has been reached in a class action lawsuit against the Office of the Washington State Auditor ("SAO" or "Defendant") relating to a December 2020 Data Security Incident during which cybercriminals potentially accessed files that contained individuals' private information. The case is known as Stone v Accellion USA LLC, Case No. 21-2-01439-5 SEA. The Defendant denies all claims alleged against it and denies all charges of any wrongdoing or liability. The settlement is not an admission of wrongdoing or an indication that the Defendant has violated any laws, but rather the resolution of disputed claims.

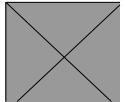
Stone v Accellion USA LLC

P.O. Box 911

Baton Rouge, LA 70821

ELECTRONIC SERVICE REQUESTED

SETTLEMENT CLAIM ID: [claim Id]
[FIRST NAME] [LAST NAME]
[ADDRESS1]
[ADDRESS2]
[CITY] [STATE] [ZIP]



0165

Place Stamp
Here

Return Mail Information

Am I included? Yes. If you received this notice, Defendant's records indicate that your information may have been involved in the Data Security Incident.

What are the benefits? The Settlement provides for the following cash payments for Settlement Class Members who submit a Valid Claim: (i) Compensation for Out-of-Pocket Losses and Reimbursement for Lost Time, or (ii) an Alternative Compensation. Please visit www.SAOFTASettlement.com for complete information about the Cash Benefits.

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You do not need to appear at the hearing, but you may come at your own expense. The Court has appointed the law firms of Tousley Brain Stephens PLLC and Gibbs Mura LLP to represent the Settlement Class. You will not be charged for their services. If you want to be represented by your own lawyer, you may hire one at your own expense.

How do I get more information? For additional information, including a copy of the Settlement Agreement, Long Notice, Claim Form, and other Court documents, visit the Documents section of the Settlement Website, www.SAOFTASettlement.com, or call 1-844-978-4141. You may also contact the Claims Administrator at Stone v Accellion USA LLC, PO Box 911, Baton Rouge, LA 70821.

ACCELLION DATA INCIDENT CLAIM FORM

Settlement Claim ID: « Claim ID»

«FirstName» «LastName»
«Address1» «Address2» «City» «State» «Zip»

Complete this Claim Form if you wish to receive the Alternative Compensation Cash Award. If you want to submit a claim for Out-of-Pocket Losses or Attested Time, or if you need to update your mailing address, visit www.SAOFTASettlement.com to submit your Claim Form and supporting documentation online or to download a Claim Form to complete and return by mail. If you need to update your mailing address after the submission of your Claim Form, email the Settlement Administrator at info@SAOFTASettlement.com.

ALTERNATIVE COMPENSATION CASH AWARD

☐ Check this box if you wish to receive the Alternative Compensation Cash Award in lieu of reimbursement for Out-of-Pocket Expenses or Attested Time. The amount of the cash award will be increased or decreased on a pro rata basis, depending upon the number of valid claims filed and the amount of funds available for these payments.

PAYMENT SELECTION

☐ PayPal ☐ Venmo ☐ Zelle ☐ Check

Please provide the email address or phone number associated with your PayPal, Venmo or Zelle account:

Phone Number: _____

Email Address: _____

Attestation & Signature: I swear and affirm under penalty of perjury that the information provided in this Claim Form is true and correct to the best of my knowledge. I understand that my claim is subject to verification and that I may be asked to provide supplemental information by the Settlement Administrator before my claim is considered complete and valid.

Signature: _____ Printed Name: _____ Date: ____/____/____

EXHIBIT C

<div>Exclusion Requests</div> <div><i>Stone v Accellion</i></div>				
Count	First Name	Last Name	State	Submitted Date
1	Barry	Lia	WA	8/2/2025
2	Frank	Miscione	WA	8/7/2025
3	Darla	Tighe	VT	8/21/2025
4	Anne	Frederick	MT	9/18/2025
5	Holly	Riahi	VA	8/6/2025
6	Edward	Chambers	BC	9/11/2025
7	Secolia	Garcia	WA	9/18/2025
8	Adam	Huntley	WA	9/23/2025