



**SETTLEMENT CLASS MEMBER DATA**

4. Between April 22 and May 7, 2024, JND received spreadsheets from Defendant containing the names, mailing addresses, e-mail addresses (where available), membership numbers, and other identifying information for 2,655 individuals identified as potential Settlement Class Members.

5. Prior to sending notices, JND analyzed the raw data to remove potential duplicates and consolidate records, resulting in 2,636 unique Settlement Class Member records. JND updated the Settlement Class Member contact information using data from the National Change of Address (“NCOA”) database along with advanced address research through skip-tracing as required under the terms of the Settlement Agreement. The Settlement Class Member data was promptly loaded into a secure database established for this Action.

**MAILED NOTICE**

6. Pursuant to the terms of the Settlement Agreement, on May 30, 2024, JND mailed the Court-approved postcard notice (“Postcard Notice”) via USPS first-class mail to 2,636 Settlement Class Members. A representative sample of the Postcard Notice is attached hereto as **Exhibit A**.

7. As of the date of this Declaration, of the total 2,636 Postcard Notices mailed, JND tracked 105 Postcard Notices that were returned to JND as undeliverable. Of these, 2 (two) Postcard Notices were forwarded to updated addresses provided by the USPS. JND conducted advanced address research for the remaining undeliverable Postcard Notices and received updated address information for an additional 45 Settlement Class Members. JND promptly re-mailed Postcard Notices to these 45 Settlement Class Members (of which 7 (seven) were returned to JND as undeliverable).

**E-MAIL NOTICE**

8. On May 30, 2024, JND e-mailed the customized, Court-approved postcard notice via E-mail (“E-mail Notice”) to each of the 2,261 e-mail addresses associated with Settlement Class Member records (invalid e-mail addresses were not included in the E-mail Notice campaign). A representative sample of the E-mail Notice is attached hereto as **Exhibit B**.

9. Of the 2,261 E-mail Notices sent, a total of 2,189 E-mail Notices were delivered successfully. Included in the E-mail Notices was a hyperlink permitting the Settlement Class Members to file a Claim Form online.

10. As of the date of this Declaration, 2,595 Settlement Class Members were e-mailed or mailed a notice (“Notice”) that was not returned as undeliverable, representing 98.4% of total Settlement Class Members.

#### **SETTLEMENT WEBSITE**

11. On May 30, 2024, JND established a Settlement Website ([www.RevanceSettlement.com](http://www.RevanceSettlement.com)), which provides comprehensive information about the Settlement, including copies of important case documents, answers to frequently asked questions, and contact information for the Settlement Administrator. Additionally, the Settlement Website allowed Settlement Class Members to submit a Claim Form electronically or download a fillable copy of the Claim Form if a Class Member elected to print and submit it by mail.

12. As of the date of this Declaration, the Settlement Website has tracked 1,109 unique users with 2,983 page views. JND will continue to update and maintain the Settlement Website throughout the administration process.

#### **TOLL-FREE INFORMATION LINE AND P.O. BOX**

13. On May 30, 2024, JND established a case-specific toll-free number (1-877-595-0187) for Settlement Class Members to call to obtain information regarding the Settlement. Callers have the option to listen to the Interactive Voice Response (“IVR”) system, or to speak with a live agent. The toll-free number is accessible 24 hours a day, seven days a week. As of the date of this Declaration, the toll-free number has received 15 incoming calls. JND will continue to maintain the toll-free number throughout the settlement administration process.

14. Additionally, JND established a post office box for this administration to receive Settlement Class Member correspondence, paper Claim Forms, and exclusion requests. The administration address is Revance Settlement Administrator, c/o JND Legal Administration, P.O. Box 91308, Seattle, WA 98111.

**REQUESTS FOR EXCLUSION**

15. The Notices informed recipients that any Settlement Class Member who wished to exclude themselves from the proposed Settlement (“opt-out”) must do so by mailing an exclusion letter to the Settlement Administrator, postmarked on or before July 29, 2024.

16. As of the date of this Declaration, JND has received one (1) timely exclusion request from Settlement Class Member Vojin Kos (of Alamo, CA).

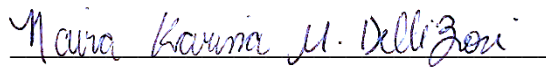
**OBJECTIONS**

17. The Notices informed recipients that any Settlement Class Member who wished to object to the proposed Settlement could do so by filing a written objection with the Court, postmarked on or before July 29, 2024.

18. As of the date of this Declaration, JND has not received, and is not aware of, any objections.

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

Executed October 4, 2024 in Seattle, Washington.

  
\_\_\_\_\_  
Naira Karina M. Delli-Bovi