

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

MEGANNE NATALE and CHELSEA
CHENG, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

9199-4467 QUEBEC INC., d/b/a EARTH
RATED,

Defendant.

Case No. 2:21-cv-6775-JS-SIL

Hon. Joanna Seybert

**SUPPLEMENTAL DECLARATION OF RYAN BAHRY REGARDING SETTLEMENT
ADMINISTRATION**

I, RYAN BAHRY, declare and state as follows:

1. I am a Director at JND Legal Administration (“JND”). JND is a legal administration service provider with its headquarters in Seattle, Washington. JND has extensive experience with all aspects of legal administration and has administered settlements in hundreds of class action matters.

2. JND is serving as the Settlement Administrator¹ in the above-captioned litigation (the “Action”), pursuant to the Court’s Order Granting Preliminary Approval of Class Action Settlement Agreement, dated May 14, 2024 (“Order”).

3. This Supplemental Declaration is meant to supplement my previous declaration dated September 9, 2024 (the “Declaration”). This Supplemental Declaration is based on my

¹ Capitalized terms used and otherwise not defined in this Declaration shall have the meanings given to such terms in the Class Action Settlement Agreement.

personal knowledge and information provided to me by experienced JND employees and, if called on to do so, I could and would testify competently thereto.

CLAIMS RECEIVED

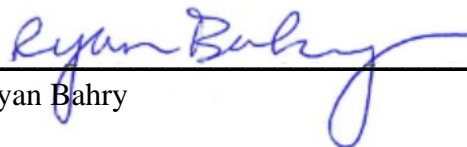
4. Settlement Class Members were required to file a Claim Form by mail or electronically on the Settlement Website in order to participate in the Settlement and receive a cash payment, postmarked or submitted on or before December 9, 2024.

5. As of the date of this Supplemental Declaration, JND received a total of 1,483,650 Claim Forms (1,483,490 Claim Forms were submitted electronically and 160 Claim Forms were submitted by mail). As discussed with the Parties, JND used an hCaptcha score to preliminarily determine the validity of the electronically submitted Claim Forms.

6. As of the date of this Supplemental Declaration, JND has preliminarily identified 128,881 potentially valid electronic claims with an approximate claimed total dollar amount of \$746,424.00. The Parties and JND anticipate that additional review may be necessary to evaluate the existing potentially valid claims. JND is in the process of receiving, reviewing, and validating additional Claim Form submissions.

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

Executed on September 11, 2024, in Seattle, Washington.



Ryan Bahry

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