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12 13 14 15	RALPH MILAN and ELIZABETH ARNOLD on behalf of themselves, those similarly situated and the general public, Plaintiffs,		54-JD DTICE OF MOTION AND INAL APPROVAL OF CLASS
16 17 18	v. CLIF BAR & COMPANY, Defendant.	Judge: Hearing Date: Location:	Hon. James Donato November 14, 2024, 10:00 a.m. Courtroom 11, 19th Floor
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#### **NOTICE OF MOTION**

2 TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD: PLEASE TAKE 3 NOTICE THAT, pursuant to Fed. R. Civ. P. 23(e), the Northern District of California's Procedural Guidance 4 for Class Action Settlements ("Settlement Guidance"), and the Court's July 12, 2024 Order Granting 5 Preliminary Approval (Dkt. No. 261, the "PA Order"), on November 14, 2024, at 10:00 a.m., or as soon thereafter as may be heard, Plaintiffs will move the Court, the Honorable James Donato presiding, for an 6 7 Order (1) finally certifying the Settlement Class, (2) finally approving the Settlement as fair, reasonable, and 8 adequate to the Class, (3) directing the parties to undertake the obligations set forth in the Settlement 9 Agreement that arise out of the Court's final approval, (4) entering Judgment, and (5) maintaining jurisdiction over for purpose of enforcing the Judgment. This Motion is based on this Notice of Motion; the below 10 11 Memorandum; the concurrently-filed declarations of Jack Fitzgerald ("Fitzgerald Decl.") and Brandon 12 Schwartz ("Schwartz Decl."), and all exhibits thereto; the October 31, 2023 Declaration of Jack Fitzgerald 13 in Support of Plaintiffs' Motion for Preliminary Approval (Dkt. No. 252, the "PA Fitzgerald Decl."); the June 23, 2022 Declaration of Jack Fitzgerald in Support of Plaintiffs' (Initial) Motion for Preliminary 14 Approval (Dkt. No. 226-1, the "2022 PA Fitzgerald Decl."); the parties' October 30, 2023 Settlement 15 Agreement ("SA"), Attached as Exhibit 1 to the PA Fitzgerald Decl., see Dkt. No. 252-1; all prior pleadings 16 17 and proceedings; and any additional evidence and argument submitted in support of the Motion.

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#### **ISSUES TO BE DECIDED**

Whether to confirm certification of the Settlement Class and finally approve the parties' Settlement
as fair, reasonable, and adequate to the Class. *See* Fed. R. Civ. P. 23(a), (b), (e).

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#### **MEMORANDUM OF POINTS & AUTHORITIES**

#### 22 II. INTRODUCTION

On July 12, 2024, the Court preliminarily approved a nationwide class action Settlement between
Class Representatives Ralph Milan and Elizabeth Arnold, and Defendant Clif Bar & Co. See PA Order ¶ 1
(finding the "terms of the Settlement Agreement . . . fair, reasonable and adequate . . . sufficient to warrant
sending Notice to the Settlement Class . . . subject to further consideration at the Final Approval Hearing").
The Settlement resolves allegations Clif violated consumer protection laws and breached warranties by
misleadingly marketing its Clif Bars and Clif Kid ZBars as healthy. See generally Dkt. No. 1, Compl.

1 Notice has now been provided to the Class in accordance with the approved Notice Plan. See 2 Schwartz Decl. ¶¶ 6-24. This included direct email notice to 4,389,657 Settlement Class Members (with 3 efforts ongoing); publication notice in US Weekly; digital and streaming advertising resulting in 455,685,813 4 digital impressions; a press release through PR Newswire's US1 and National Hispanic Newsline, which was 5 picked up by 588 media outlets for a total potential audience of 119,000,000; and publication in USA Today's California/Arizona region once a week for four consecutive weeks. See id. ¶ 7-17 & Exs. B-I. The 6 7 administrator also established a Settlement Website, toll-free hotline, and provided mail and email support 8 to Class Members. Id. ¶¶ 18-24. As a result of these efforts, "the Notice Plan achieved a reach of more than 9 80% with an average frequency of 2.5"-which "does not include" the direct email notice sent to Amazon and Target customers, nor "account for CLRA [notice], the Settlement Website, toll-free hotline, or press 10 release," which "all . . . enhance the overall reach and frequency of the Notice Plan." Id. ¶ 41. 11

The Class's response to the Settlement has been overwhelmingly positive. *See* Settlement Guidance, Final Approval ¶ 1. While 322,713 Class Members so far made valid claims—representing a robust 4.36% claims rate so far<sup>1</sup>—only 93 have opted out, and only one has objected, and then only to one proposed *cy pres* recipient.<sup>2</sup> Schwartz Decl. ¶¶ 38-39 & Ex J (list of opt-outs); Dkt. No. 266 (Objection of Scott Dodson). If the Court approves the notice and administration costs currently estimated, *see* Schwartz Decl. ¶ 34, and the attorneys' fees and costs, and service awards requested, claimants are currently expected to receive an average refund of around \$20.72, *id.* ¶¶ 35-37.

As reflected by the high number of claims, few exclusions (representing just 0.00125% of the class),
and dearth of objections, this is a fair, reasonable, and adequate Settlement that provides an excellent result
for the Class while eliminating the risk and expense of continued litigation and inherent risks of trial.<sup>3</sup>

<sup>1</sup> The estimated class size is 7.4 million. See PA Fitzgerald Decl. ¶ 8. The claims rate is thus more than the 3% predicted, see id. ¶ 51, higher than the rates in *Krommenhock, Hadley, Pettit*, and *Fitzhenry-Russell*, and on par with the rates in *McMorrow* and *Hanson, see id.* ¶ 55. Moreover, because the claims period extends through November 25, the claims rate will continue to increase over the next few weeks.

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<sup>25</sup> Although three Class Members filed documents styled "objections" (Dkt. Nos. 264, 265, 267), they just take issue with the lawsuit itself, and do not contend anything about the Settlement is unfair, unreasonable, or inadequate for the Class. By illustrating the challenges inherent to this sort of case, however, *see* PA Fitzgerald Decl. ¶ 31, these filings further demonstrate the Settlement is an excellent result.

28 <sup>3</sup> The procedural, litigation, and settlement history was detailed in Plaintiffs' Motion for Preliminary Approval, *see* Dkt. No. 251 ("PA Mot.") at 1-3; *see also* 2022 PA Fitzgerald Decl. ¶¶ 3-14.

Plaintiffs thus respectfully request the Court grant the Settlement final approval and enter Judgment.

# II. LEGAL STANDARD

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3 "Judicial policy favors settlement in class actions and other forms of complex litigation where 4 substantial resources can be conserved by avoiding the time, cost, and rigors of formal litigation." Espinosa 5 v. Cal. Coll. of San Diego, Inc., 2018 WL 1705955, at \*5 (S.D. Cal. Apr. 9, 2018) (citing In re Wash. Pub. Power Supply Sys. Sec. Litig., 720 F. Supp. 1379, 1387 (D. Ariz. 1989)); see also McMorrow v. Mondelez 6 Int'l, Inc., 2022 WL 1056098, at \*2 (S.D. Cal. Apr. 8, 2022) ("[T]he Ninth Circuit maintains 'a strong judicial 7 8 policy' that favors settlements of class actions." (quoting Class Plaintiffs v. City of Seattle, 955 F.2d 1268, 9 1276 (9th Cir. 1992))). A class action settlement must be approved by the court before it is effective. See 10 Fed. R. Civ. P. 23(e). In making this determination:

The factors in a court's fairness assessment will naturally vary from case to case, but courts generally must weigh (1) the strength of the plaintiff's case; (2) the risk, expense, complexity, and likely duration of further litigation; (3) the risk of maintaining class action status throughout the trial; (4) the amount offered in settlement; (5) the extent of discovery completed and the stage of the proceedings; (6) the experience and views of counsel; (7) the presence of a governmental participant; and (8) the reaction of the class members of the proposed settlement.

16 In re Bluetooth Headset Prods. Liab. Litig., 654 F.3d 935, 946 (9th Cir. 2011) (quoting Churchill Vill., L.L.C.

17 || v. Gen. Elec., 361 F.3d 566, 575 (9th Cir. 2004)); see also Arnold v. DMG Mori USA, Inc., 2022 WL

18 || 18027883, at \*2 (N.D. Cal. Dec. 30, 2022) (Donato, J.). Further:

While considering all these interests, "the court's intrusion upon what is otherwise a private consensual agreement negotiated between the parties to a lawsuit must be limited to the extent necessary to reach a reasoned judgment that the agreement is not the product of fraud or overreaching by, or collusion between, the negotiating parties, and that the settlement, taken as a whole, is fair, reasonable and adequate to all concerned."

22 Knapp v. Art.com, Inc., 283 F. Supp. 3d 823, 831 (N.D. Cal. 2017) (quoting Officers for Justice v. Civil Serv.

23 Comm'n, 688 F.2d 615, 625 (9th Cir. 1982)).

- 24 III. THE COURT SHOULD CONFIRM CERTIFICATION OF THE SETTLEMENT CLASS
- 25 The Court previously certified the Settlement Class, finding it "meets the requirements of Fed. R.

26 Civ. P. 23(a) and (b)(3)." PA Order ¶ 4. "Nothing material has changed on this score since preliminary

27 approval," and "[n]o class member or party has challenged the propriety of class certification . . . ." See

28 Pennington v. Tetra Tech EC, Inc., 2022 WL 899843, at \*4 (N.D. Cal. Mar. 28, 2022) (Donato, J.).

Accordingly, the Court should "certif[y] a final settlement class" and "confirm[] the appointment" of the Class Representatives and Class Counsel. *See id*.

# IV. THE SETTLEMENT SHOULD BE FINALLY APPROVED

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A consideration of the Rule 23(e)(2) requirements and *Churchill* factors shows the Settlement is fair, reasonable, and adequate. *See In re Facebook Biometric Info. Privacy Litig.*, 522 F. Supp. 3d 617, 626 (N.D. Cal. 2021) (Donato, J.) ["*In re Facebook*"] ("Several of the factors discussed in the *Churchill Village* case overlap with the Rule 23(e)(2)(C) subfactors, and also go to evaluating the adequacy of relief for the class.").

# A. The Strength of the Case, and Risk, Expense, Complexity, and Likely Duration of Further Litigation

"In determining whether the settlement is fair, reasonable, and adequate" courts first "balance the 10 11 risks of continued litigation, including the strengths and weaknesses of plaintiff's case, against the benefits 12 afforded to class members, including the immediacy and certainty of recovery." Knapp, 283 F. Supp. 3d at 13 831-32 (citing Larsen v. Trader Joe's Co., 2014 WL 3404531, at \*4 (N.D. Cal. July 11, 2014); LaGarde v. Support.com, Inc., 2013 WL 1283325, at \*4 (N.D. Cal. Mar. 26, 2013)). Given "all the normal perils of 14 litigation as well as the additional uncertainties inherent in complex class actions," In re Beef Indus. Antitrust 15 Litig., 607 F.2d 167, 179-80 (5th Cir. 1979), "unless [a proposed] settlement is clearly inadequate," a court 16 should normally find "its acceptance and approval are preferable to lengthy and expensive litigation with 17 18 uncertain results," Knapp, 283 F. Supp. 3d at 832 (citing Nat'l Rural Telecomms. Coop. v. DIRECTV, Inc., 19 221 F.R.D. 523, 526 (C.D. Cal. 2004) (internal quotation marks omitted)); see also Rojas v. Zaninovich, 2015 WL 3657172, at \*12 (E.D. Cal. June 11, 2015) (Courts consider, among other things, the "normal perils 20 21 of litigation, including the merits of the affirmative defenses asserted by Defendant, the difficulties of complex litigation, [and] the lengthy process of establishing specific damages ...."). 22

Here, "[w]hile the plaintiffs . . . believe their claims are strong, they acknowledge," as detailed in their Preliminary Approval Motion, "that they would face significant risks should the case proceed through litigation." *See Larsen*, 2014 WL 3404531, at \*4 (record citation omitted); PA Mot. at 11-12. Of course, Clif "vigorously denied liability and challenged all of the plaintiffs' claims." *See Larsen*, 2014 WL 3404531, at \*4 (record citation omitted); *see also, e.g.*, Dkt. No. 106 (Clif motion for summary judgment on all of Plaintiffs' claims). For example, Clif disputed that the challenged claims convey a health message, and that

1 they are material, and supported those arguments with expert evidence from Stanford professor Dr. Itamar 2 Simonson. PA Fitzgerald Decl. ¶ 30. Clif also disputed that the types of sugar in the bars are as detrimental 3 to health as Plaintiffs claim. Id. Focus group and mock trial results revealed a certain amount of attitudinal resistance to Plaintiffs' claims and awarding damages in their favor. Id. ¶ 31; compare Dkt. Nos. 264, 265, 4 5 267. And even if Plaintiff maintained class certification and prevailed at trial, Clif would likely press numerous issues on appeal. PA Fitzgerald Decl. ¶ 33. Thus, "[t]he record here leaves no doubt that the class 6 7 would face substantial hurdles to prevailing at trial, and if successful, preserving the verdict on appeal." See 8 In re Facebook, 522 F. Supp. 3d at 627.

9 The Settlement, by contrast, "achieves a definite and certain result for the benefit of the Settlement Class[]," making it "preferable to continuing litigation in which the Settlement Class would necessarily 10 confront substantial risk, uncertainty, delay, and cost." See Donald v. Xanitos, Inc., 2017 WL 1508675, at \*2 11 12 (N.D. Cal. Apr. 27, 2017). In light of "the significant risks that lie ahead . . . [at] trial, it is reasonable for the 13 parties at this stage to agree that the actual recovery realized and risks avoided here outweigh the opportunity to pursue potentially more favorable results." See Larsen, 2014 WL 3404531, at \*4. Because "[t]he 14 settlement avoids the risks that the [P]laintiffs would not succeed in demonstrating that [Clif] failed to comply 15 with state consumer protection laws," "this factor weighs in favor of final approval of the settlement." See 16 id.; see also Rieckborn v. Velti PLC, 2015 WL 468329, at \*4-5 (N.D. Cal. Feb. 3, 2015) (the "first two 17 18 [Churchill] factors weigh in favor of approval" where "Plaintiffs contend that their claims have significant 19 merit but acknowledge a number of risks and uncertainties should they proceed," including that "Defendants 20 have adamantly denied liability and have asserted from the outset that they possess absolute defenses to all 21 of plaintiffs' claims," and that "[p]roving damages would also entail substantial uncertainty . . . depend[ing] ... on which, if any, of the four alleged partial corrective disclosures plaintiffs are ultimately able to rely," 22 23 making "further litigation . . . likely to be costly and time-intensive, with no guarantee of a more beneficial outcome for class members as a result"); Nguyen v. Radient Pharms. Corp., 2014 WL 1802293, at \*2 (C.D. 24 Cal. May 6, 2014) (finding first two Churchill factors met where, "although [the plaintiffs'] claims were 25 quite strong," there were factual challenges facing them at trial, including regarding "damages"). 26

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#### B. The Amount of Settlement

2 "This factor examines the benefits to class members." Larsen, 2014 WL 3404531, at \*4 (citing 3 Churchill Vill., 361 F.3d at 574). "Assessing the fairness, adequacy, and reasonableness of the amount offered in settlement is not a matter of applying a 'particular formula.'" Knapp, 283 F. Supp. 3d at 832 4 5 (quoting Rodriguez v. W. Publ'g Corp., 563 F.3d 948, 965 (9th Cir. 2009)). Instead, "[w]hen considering the fairness and adequacy of the amount offered in settlement, 'it is the complete package taken as a whole, 6 7 rather than the individual component parts, that must be examined for overall fairness."" Bellinghausen v. 8 Tractor Supply Co., 306 F.R.D. 245, 256 (N.D. Cal. 2015) (quoting Nat'l Rural Telecomms. Coop., 221 9 F.R.D. at 527). Further, "it is well-settled law that a proposed settlement may be acceptable even though it amounts to only a fraction of the potential recovery that might be available to the class members at trial." 10 Nat'l Rural Telecomms. Coop., 221 F.R.D. at 527; cf. City of Detroit v. Grinnell Corp., 495 F.2d 448, 455 11 n.2 (2d Cir. 1974) ("[T]here is no reason, at least in theory, why a satisfactory settlement could not amount 12 13 to a hundredth or even a thousandth part of a single percent of the potential recovery."). Finally, that a "Settlement Agreement also provides for injunctive relief" is an important consideration in evaluating its 14 benefit, since "class members that choose to continue doing business with [the defendant] will benefit from 15 this aspect as well." See Knapp, 283 F. Supp. 3d at 833. 16

Here, the Settlement's \$12 million common fund for a nationwide Class of approximately 7.4 million is fair, reasonable, and adequate, especially in light of the injunctive relief obtained for it and the public's benefit, *see* PA Mot. at 7, 13-14. The amount of the cash refunds Class Members are predicted to receive if the Court approves the notice and administration costs, attorneys' fees and costs, and service awards requested—between \$6.30 and \$64.00, with an average refund of \$20.72, *see* Schwartz Decl. ¶¶ 35-37<sup>4</sup>— "are substantial in comparison with other low-cost consumer goods false advertising cases," *see McMorrow*, 2022 WL 1056098, and represent significant recoveries in relation to potential trial damages, where Plaintiffs

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<sup>&</sup>lt;sup>4</sup> Although administration is ongoing, because the claims deadline runs through November 25, P&N's estimated costs are similar to what was estimated at the preliminary approval stage. *See* PA Fitzgerald Decl.
<sup>¶</sup> 71 (for a 5% claims rate, or 370,000 claims, estimating notice costs of \$337,391 and administration costs of \$298,030, or about \$635,000). P&N's present estimate, which is about \$62,000 higher, is based on its incurring some unanticipated costs in connection with processing the class member data provided by Target, and a conservative assumption about the incoming data for providing direct notice to Walmart and Kroger Clif bar consumers. Schwartz Decl. ¶ 34 n.7. Accordingly, P&N's final costs may be less, *id.*, and Class Counsel will provide a more final accounting following the close of the claims period.

<sup>)</sup> 

1 would have to show "the difference between the prices customers paid and the value of the [products] they 2 bought-in other words, the 'price premium' attributable to" the challenged claims, see Brazil v. Dole 3 Packaged Foods, LLC, 660 Fed. App'x 531, 534 (9th Cir. 2016); see also McMorrow, 2022 WL 1056098, 4 at \*6 ("Class Members will receive an average refund of \$20.96 (minimum \$3.81, maximum \$52.98), which 5 is considered an 'excellent result' in the context of low-cost consumer good false advertising cases." (quoting Hilsley v. Ocean Spray Cranberries, Inc., 2020 WL 520616, at \*6 (S.D. Cal. Jan. 31, 2020) (\$1.00 recovery 6 7 per bottled purchased was "an excellent result" considering the fraction of purchase price recoverable at 8 trial)). Moreover, the amounts claimants will receive here are similar to what Settlement Class Members in 9 Hadley and Krommenhock received. Fitzgerald Decl. ¶¶ 2-3; see also Hadley v. Kellogg Sales Co., 2021 WL 5706967, at \*2 (N.D. Cal. Nov. 23, 2021) (Granting final approval where "[t]he[ir] efforts allowed Class 10 Counsel to obtain a significant monetary recovery for the class as well as injunctive relief that provides health 11 benefits to all purchasers of Defendant's products."); Krommenhock v. Post Foods, LLC, 2021 WL 2910205, 12 13 at \*2 (N.D. Cal. June 25, 2021) (granting final approval after finding that "the terms [of the Settlement] constitute, in all respects, a fair, reasonable, and adequate settlement as to all Settlement Class Members").<sup>5</sup> 14 15 Using conjoint analysis, Plaintiffs' damages experts, Steven Gaskin and Colin Weir, calculated a 3.8% price premium for Clif Bars' "Nutrition for Sustained Energy" claim, equivalent to 30¢ for a \$7.99 six-16 pack of Clif Bars, or about 5¢ in damages per bar. Fitzgerald Decl. ¶ 4. Based on this premium, claimants 17 18 are predicted to receive damages for between 126 and 1,280 Clif Bars (and 414 on average). Plaintiffs' 19 experts calculated damages of 7.8% for Clif Kid Z Bar's "Nourishing Kids in Motion" claim, equivalent to 20 53¢ for a \$6.79 six-pack of Clif Kid Z Bars, or 8.8¢ per bar. Id. Based on this premium, claimants are expected

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<sup>22</sup> <sup>5</sup> Cf. Broomfield v. Craft Brew Alliance, Inc., 2020 WL 1972505, at \*9 (N.D. Cal. Feb. 5, 2020) (approving) settlement where Class Members would receive \$1.25 to \$2.75 per unit purchased for up to \$10 without proof 23 of purchase); Fitzhenry-Russell v. Coca-Cola Co., 2019 WL 11557486, at \*6 (N.D. Cal. Oct. 3, 2019) (approving settlement fund of \$2,450,000 that would pay restitution of \$0.80 per unit, up to \$10.40 (13 units) 24 without proof of purchase); Hendricks v. Starkist Co., 2016 WL 5462423, at \*5 (N.D. Cal. Sept. 29, 2016) (approving settlement in which class members would receive \$1.97 cash or \$4.43 voucher per claim, and 25 noting that the "settlement amount, while constituting only a single-digit percentage of the maximum 26 potential exposure, is reasonable given the stage of the proceedings and the defenses asserted"); cf. De Leon v. Ricoh USA, Inc., 2020 WL 1531331, at \*9 (N.D. Cal. Mar. 31, 2020) (granting final approval where "[i]n 27 granting preliminary approval the Court concluded that the estimated payout to class members was fair in relation to the risks of continued litigation . . . and there [wa]s nothing in the final approval materials that 28 change[d] the Court's analysis on that score" (record citations omitted)).

to receive damages for between 71 and 727 Kid Z Bars (235 on average). Since, during the relevant time period, typical buy rates for the heaviest users of both bars were below 100 bars per year, *id.*  $\P$  5, claimants are being reimbursed for damages covering the equivalent of years of purchases.

Because the Settlement amount is a fair, reasonable, and adequate result for the Class, this factor weighs in favor of approval.

#### C. Extent of Discovery Completed and Stage of Proceedings

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7 "The extent of discovery completed and the state of the proceedings at the time of settlement is a 8 strong indicator of whether the parties have sufficient understanding of each other's cases to make an informed judgment about their likelihood of prevailing." Lane v. Brown, 166 F. Supp. 3d 1180, 1190 (D. Or. 9 2016). "A court is more likely to approve a settlement if most of the discovery is completed because it 10 11 suggests that the parties arrived at a compromise based on a full understanding of the legal and factual issues 12 surrounding the case." Nat'l Rural Telecomms. Coop., 221 F.R.D. at 527 (internal quotation marks and 13 citation omitted). "For that reason, '[a] settlement following sufficient discovery and genuine arms-length negotiation is presumed fair." Lane, 166 F. Supp. 3d at 1190 (emphasis added) (quoting Nat'l Rural 14 Telecomms. Coop., 221 F.R.D. at 528). 15

Here, the parties litigated for more than four years, including extensive motion practice regarding the 16 17 pleadings, class certification, expert reports, and summary judgment. Fact and expert discovery were both 18 complete and extensive. See 2022 PA Fitzgerald Decl. ¶ 3-9. Moreover, the Settlement was only reached 19 through multiple arms' length mediations-two with Judicate West mediator, Jill R. Sperber, Esq.; a 20 settlement conference with Magistrate Judge Joseph C. Spero, see id. ¶ 10-14; and a final mediation with 21 JAMS mediator, Hon. Andrew J. Guilford (Ret.), see Dkt. No. 262-1, PA Fitzgerald Decl. Ex. 1 at 161, 164, 22 167 (May 2, 2023 time entries). "The assistance of an experienced mediator in the settlement process supports 23 the finding that the Settlement is non-collusive." Huntsman v. Sw. Airlines, Co., 2018 WL 11371114, at \*2 (N.D. 24 Cal. Dec. 5, 2018) (Donato, J.); see also Arnold, 2022 WL 18027883, at \*2 (where "the parties participated in 25 two days of private mediation, and ultimately reached a settlement in principle after a full-day conference facilitated by a magistrate judge," this "establishes that the settlement agreement was negotiated at arm's length, 26 27 which weighs in favor of final approval" (internal record citations omitted)); Gaudin v. Saxon Mortg. Servs., 28 Inc., 2015 WL 7454183, at \*6 (N.D. Cal. Nov. 23, 2015) (factor supported final approval where plaintiff

1 "conduct[ed] 'extensive discovery and investigation (before and after class certification),' reviewing 2 'approximately 25,000 pages of [Defendant's] documents,' and participating in 'three separate rounds of 3 settlement negotiations" (record citations omitted)). In sum, because "[t]he case was on the cusp of trial and so was fully developed, and counsel on both sides had a mature understanding of the issues and risks on both 4 5 sides," see In re Facebook, 522 F. Supp. 3d at 628, this factor "strongly favors approval," see Lane, 166 F. Supp. 3d at 1185 (granting final approval where "[a]fter almost four years of litigation, extensive fact and 6 7 expert discovery, and prior unsuccessful efforts to resolve the dispute, the parties engaged in lengthy 8 settlement negotiations a few months before trial and signed a Proposed Settlement Agreement").

#### D. The Experience and Views of Class Counsel

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The Ninth Circuit "ha[s] held that '[p]arties represented by competent counsel are better positioned 10 11 than courts to produce a settlement that fairly reflects each party's expected outcome in litigation," 12 Rodriguez, 563 F.3d at 967 (quoting In re Pac. Enters. Sec. Litig., 47 F.3d 373, 378 (9th Cir. 1995)). In 13 determining whether a settlement is fair and reasonable, "[t]he judgment of experienced counsel regarding the settlement is [therefore] entitled to great weight." White v. Experian Info. Solutions, Inc., 2009 WL 14 10670553, at \*12 (C.D. Cal. May 7, 2009) (citing M. Berenson Co. v. Faneuil Hall Marketplace, Inc., 671 15 F. Supp. 819, 822 (D. Mass 1987); Linney v. Cellular Alaska P'ship, 1997 WL 450064, at \*5 (N.D. Cal. 16 1997); Ellis v. Naval Air Rework Facility, 87 F.R.D. 15, 18 (N.D. Cal. 1980)). As a result, "[t]he 17 18 recommendations of plaintiffs' counsel should be given a presumption of reasonableness." Id. (quoting Boyd 19 v. Bechtel Corp., 485 F. Supp. 610, 622 (N.D. Cal. 1979)).

20 Here, Class Counsel has considerable experience in consumer class actions, and particularly those involving the false advertising of foods and beverages as healthy. During the pendency of this action, Class 21 22 Counsel litigated a series similar cases concerning the advertising of sugary foods and beverages as healthy, 23 and has therefore been exposed to a wide variety of information about the claims and defenses, and ultimately the potential upside and risks attendant to this case. PA Fitzgerald Decl. ¶¶ 36-38. Because Class Counsel 24 has substantial experience with complex class actions generally, and an intimate understanding of the 25 relevant facts and issues here particularly, and strongly endorses the Settlement, this factor favors final 26 approval. See McMorrow, 2022 WL 1506098, at \*4 ("Here, due especially to the experience and knowledge 27 28 of Class Counsel, their recommendations are presumed to be reasonable, and this factor accordingly favors

approval."); *Larsen*, 2014 WL 3404531, at \*5 (factor favored final approval where "Plaintiffs' counsel ha[d]
 successfully represented consumers both as litigation class and settlement class counsel numerous times,
 including cases involving food mislabeling," and "believe[d] approval [wa]s in the best interests of the
 putative settlement class.").

## E. The Presence of a Governmental Participant

6 "There is no governmental participant here." *See Knapp*, 283 F. Supp. 3d at 833. Because, however,
7 P&N "notified officials of the proposed settlement pursuant to CAFA, and no government entity has raised
8 an objection," this factor "favors settlement." *See id.* (internal record citation omitted) (citing *Schuchardt v.*9 *Law Office of Rory W. Clark*, 314 F.R.D. 673, 685 (N.D. Cal. 2016); *Holman v. Experian Info. Sols., Inc.*,
10 2014 WL 7186207, at \*3 (N.D. Cal. Dec. 12, 2014); *Garner v. State Farm Mut. Auto. Ins. Co.*, 2010 WL
11 1687832, at \*14 (N.D. Cal. Apr. 22, 2010)); Schwartz Decl. ¶ 6 (no state attorney general objections).

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## F. The Reactions of the Class Members

13 The reaction of the class to the settlement is overwhelmingly positive, with 322,713 valid claims filed so far<sup>6</sup> (representing a 4.36% rate compared to the 3% rate predicted, see PA Fitzgerald Decl. ¶ 51), only 93 14 opt-outs (representing just 0.00125% of the Class), and just one objection.<sup>7</sup> This factor thus "strongly favors" 15 final approval." See Edwards v. Nat'l Milk Producers Fed'n, 2017 WL 3623734, at \*2, \*8 (N.D. Cal. June 16 26, 2017) (Factor favored approval where "307,396 class members had submitted claims online, and an 17 18 additional 125 class members had submitted paper claim forms," yet "only eight objections and one request 19 for exclusion were received out of the millions of class members receiving notice."), aff'd sub nom., Edwards v. Andrews, 846 Fed. App'x 538 (9th Cir. 2021); see also McMorrow, 2022 WL 1056098, at \*6 ("the Claims 20 21 Administrator's notice program achieved an overwhelmingly positive reaction from the class" where "[o]nly 46 exclusions and one objection were filed" (record citation omitted)); Purple Mountain Tr. v. Wells Fargo 22 23 & Co., 2023 WL 11872699, at \*5-6 (N.D. Cal. Sept. 26, 2023) (Donato, J.) (approving settlement with 76

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<sup>&</sup>lt;sup>6</sup> The claims period ends on November 25, 2024. Class Counsel will, shortly before the Final Approval hearing, file an updated claims tally, and will file another updated and finalized tally following the November 25 closing of the claims period.

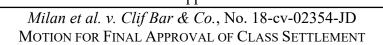
<sup>Plaintiffs' Motion for Attorneys' Fees, Costs, and Service Awards and supporting Declarations (Dkt. Nos. 262, 262-1, 262-2, and 262-3) were publicly filed on September 6, 2024 and posted to the Settlement Website the same day. Class Members thus had full access to the motion for 46 days prior the objection deadline, but no Class Member has objected to any aspect of the Motion. Fitzgerald Decl. ¶ 6.</sup> 

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1 opt-outs); cf. Norcia v. Samsung Telecomms. Am., LLC, 2021 WL 3053018, at \*3 (N.D. Cal. July 20, 2021) 2 (Donato, J.) ("While the claims rate of approximately 2.035% ... is not necessarily something to write home 3 about, it is on par with similar cases."). That is because "[a] low number of opt-outs and objections in 4 comparison to class size is typically a factor that supports settlement approval." Noll v. eBay, Inc., 309 F.R.D. 5 593, 608 (N.D. Cal. 2015) (citing Hanlon v. Chrysler Corp., 150 F.3d 1011, 1027 (9th Cir. 1998) ("[T]he fact that the overwhelming majority of the class willingly approved the offer and stayed in the class presents 6 7 at least some objective positive commentary as to its fairness")); see also Larsen, 2014 WL 3404531, at \*5 8 ("The participation rate and positive response of the class weigh[ed] in favor of finding that the settlement is 9 favorable to the class members" where "a total of 59,830 class members [] submitted claim forms, twentythree [] opted out, and sixteen [] objected"); Zepeda v. PayPal, Inc., 2017 WL 1113293, at \*15 (N.D. Cal. 10 Mar. 24, 2017) ("The Ninth Circuit has held that the number of class members who object to a proposed 11 12 settlement is a factor to be considered." (citing Mandujano v. Basic Vegetable Prods. Inc., 541 F.2d 832, 837 13 (9th Cir. 1976))).

"[T]he absence of a large number of objections to a proposed class action settlement raises a strong 14 presumption that the terms of a proposed class settlement action are favorable to the class members," Larsen, 15 2014 WL 3404531, at \*5 (quoting Nat'l Rural Telecomms. Coop., 221 F.R.D. at 529), and courts 16 "appropriately infer that a class action settlement is fair, adequate, and reasonable when few class members 17 object to it," id. (quoting Create-A-Card, Inc. v. Intuit, Inc., 2009 WL 3073920, at \*15 (N.D. Cal. Sept. 22, 18 19 2009)). "This 'strong presumption' of fairness arises here, because . . . [only one] objection[] and [93] 20 request[s] for exclusion were received out of the millions of class members receiving notice." See Edwards, 21 2017 WL 3623734, at \*8 (footnotes omitted); see also Schwartz Decl. ¶¶ 38-39 & Ex. J.

The sole objection takes issue with only one aspect of the Settlement Agreement: it's provision that, if "[a]ny funds that remain unclaimed or remain unused after the initial distribution," they "will be distributed to Class Members who cashed the initial payment, on a *pro rata* basis, to the extent the cost of such redistribution is considered economical," or, if "not considered economical, or if unpaid funds remain after a second distribution, any unpaid funds will be donated in equal shares to the Cy Pres Recipients," SA ¶ 4.11, defined as:



(i) the Resnick Center for Food Law and Policy at the University of California, Los Angeles, School of Law, and (ii) Tufts University Friedman School of Nutrition Science & Policy, or, it not approved by the Court, one or more other Court-approved nonsectarian, not-for-profit organizations whose work is sufficiently tethered to the allegations in this Action.

*Id.* ¶ 2.19. Specifically, objector Scott Dodson argues that "[n]one of the court filings in the case appears to offer justification for either of the named entities as appropriate *cy pres* recipients." Dkt. No. 266 ("Dodson Obj.") at 2.

That is wrong. The Court's Settlement Guidance states that "[i]f the settlement contemplates a cy
pres award, the parties should identify their chosen cy pres recipients . . . and how those recipients are related
to the subject matter of the lawsuits and the class members' claims." Settlement Guidance, Preliminary
Approval ¶ 8. It continues, "[t]he parties should also identify any relationship they or their counsel have with
the proposed cy pres recipients." *Id.*; *see also* Dodson Obj. at 3 (identifying same guidance).<sup>8</sup> Class Counsel
did exactly that in seeking preliminary approval. PA Fitzgerald Decl. ¶¶ 96-97 & n.13.

Having missed Class Counsel's compliance with the Settlement Guidance, Professor Dodson asserts 13 "the Resnick Center[] appears to have some conflicts of interest" because one of Plaintiffs' counsel, Jack 14 Fitzgerald "spoke at the International Food Law Conference" in San Francisco in 2020, which was "co-15 chair[ed] [by] Michael T. Roberts, then (and still) executive director of the Resnick Center." Dodson Obj. at 16 5. Professor Dodson says "a conflict would be apparent" "[i]f Mr. Roberts played a role in inviting Mr. 17 Fitzgerald to speak at the conference, perhaps using conference funds to pay for his travel and lodging," and 18 "Mr. Fitzgerald then steer[ed] cy pres funds to the Resnick Center." Id. Professor Dodson's speculation is 19 misplaced. Professor Roberts' involvement in the International Food Law Conference had no bearing on the 20 parties' selection of the Resnick Center as a potential cy pres recipient for residual funds, the Resnick Center 21

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<sup>&</sup>lt;sup>8</sup> See also Scott Dodson and Joseph A. Grundfest, "The Missing Millions: Cy Pres in Federal Securities Class 23 Actions," Emory L. J., Vol. 74, No. 1, at 35 (Sept. 23, 2024) (calling same Settlement Guidance language "[a] model worthy of emulation" that "has increased transparency about cy pres distributions"); see also id. 24 at 41-42 ("And we direct courts to the Northern District of California's Guidance on class-action practice as a starting point for reforming cy pres practice."). Notably, Professor Dodson's recent article advocates "a 25 lottery distribution" of residual funds "to one or more existing class members . . . over any cy pres 26 distribution," where "each class member has a pro-rata chance, proportionate to the size of the class member's claim, at receiving that residual amount." Id. at 29-30. Here, the Settlement Agreement provides 27 a preference for distribution of residual funds to class members, rather than cy pres recipients (i.e., if economical) in proportion to the class members' refunds, SA ¶ 4.11, which is more equitable than a 28 distribution of those funds to just one or a few class members by lottery.

has never given Class Counsel anything of value, and there are otherwise no conflicts of interest that should disqualify the Resnick Center or Tufts as *cy pres* recipients. Fitzgerald Decl. ¶¶ 7-13.

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3 The lack of objections and low opt-out rate (0.00125%) favors final approval here, since "[t]hese 4 statistics indicate a favorable reaction by class members and their overall satisfaction with the Settlement." 5 See Noll, 309 F.R.D. at 608 (factor favored approval where "of over 1,188,000 potential Class Members, only 97 have opted out" and "only three objections were filed (including one that was not timely), translating 6 7 into an objection rate of 0.00025%" (citing Custom LED LLC v. eBay, Inc., 2013 WL 6114379, at \*9 (N.D. 8 Cal. Nov. 20, 2013) (granting final approval and characterizing 0.04% exclusion rate, with one objection, as 9 "overwhelmingly positive" reaction); Chun-Hoon v. McKee Foods Corp., 716 F. Supp. 2d 848, 852 (N.D. Cal. 2010) (4.86% opt-out rate strongly supported approval))); see also Knapp, 283 F. Supp. 3d at 834 (factor 10 11 favored final approval where "[t]he settlement administrator received valid opt-outs from 452 class members, which amount[ed] to less than .03 percent of the class members who received notice," making it "apparent 12 13 that the 'overwhelming majority of the class' had nothing to say about the fairness of the settlement." 14 (quotation omitted)).

While the low opt-out and objection rates indicate the majority of the Class approved of the 15 Settlement and chose to remain in the Settlement Class, the 4.36% claims rate so far is fairly strong, and at 16 least "on par with other consumer cases, and does not otherwise weigh against approval." See Schneider v. 17 18 Chipotle Mexican Grill, Inc., 336 F.R.D. 588, 599 (N.D. Cal. 2020) (approving settlement with 0.83% claims 19 rate) (citing Broomfield, 2020 WL 1972505, at \*7 (approving settlement with response rate of "about two 20 percent")). Notably, the claims rate here is already higher than it was in Krommenhock, Hadley, Petit, and 21 Fitzhenry-Russell, and similar to the rates in McMorrow and Hanson. See PA Fitzgerald Decl. ¶ 55. 22 "[C]onsumer class actions tend to result in claims rates in the low single digits," Rael v. Children's Place, Inc., 2020 WL 434482, at \*9 (S.D. Cal. Jan. 28, 2020) (citations omitted). The Court should find the claims 23 rate supports final approval here, particularly in light of the low opt-out rate and sole objection. See Touhey 24 v. United States, 2011 WL 3179036, at \*7-8 (C.D. Cal. July 25, 2011) (approving settlement where only 38 25 claims were filed, which was "approximately 2%" claims rate, based in part on "the lack of objections"); see 26 also Keil v. Lopez, 862 F.3d 685, 696-97 (8th Cir. 2017) ("a claim rate as low as 3 percent is hardly unusual 27 28 in consumer class actions and does not suggest unfairness").

#### G. The Risk of Maintaining Class Action Status Through Trial

2 "This factor, which concerns the risk of maintaining class certification, also favors settlement." 3 Larsen, 2014 WL 3404531, at \*4. "An order that grants or denies class certification may be altered or 4 amended before final judgment." Fed. R. Civ. P. 23(c)(1)(C). This means that "if future decisions or 5 circumstances' warrant, the 'district court can decertify the class." In re Capacitors Antitrust Litig., 2020 WL 870927, at \*3 (N.D. Cal. Feb. 21, 2020) (Donato, J.) (quoting Patel v. Facebook, Inc., 932 F.3d 1264, 1276 (9th 6 Cir. 2019)). Thus, while "[t]he Court already granted class certification" "and conditionally certified a class 7 8 for settlement purposes," and "Plaintiffs believe they would be successful in maintaining class action status 9 through trial and appeal," because Clif "vigorously opposed class certification, previously filed a [23(f) petition to appeal certification, and indicated its intention to challenge certification again," "the risk that 10 Defendant may prove successful in attacking class certification . . . favors final approval of the Settlement 11 Agreement." See Flo & Eddie, Inc. v. Sirius XM Radio, Inc., 2017 WL 4685536, at \*4 (C.D. Cal. May 8, 12 13 2017); In re Facebook, 522 F. Supp. 3d at 628 (finding factor supported final approval).

#### V. **CONCLUSION** 14

#### 15 Each of the Churchill factors favors granting the Settlement final approval. Plaintiffs respectfully request that the Court overrule the objection of Scott Dodson, grant the Settlement final approval, and enter 16 Judgment. 17

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Date: October 31, 2024 19

Respectfully submitted,

20	/s/ Jack Fitzgerald
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28	Class Counsel
	14
	Milan et al. v. Clif Bar & Co., No. 18-cv-02354-JD
	MOTION FOR FINAL APPROVAL OF CLASS SETTLEMENT

	Case 3:18-cv-02354-JD Document	t 268-1 Filed	10/31/24 Page 1 of 4
1	<b>FITZGERALD MONROE FLYNN PC</b> JACK FITZGERALD (SBN 257370)		
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8	Class Counsel		
9			
10 11			
11	UNITED STATE		
13	NORTHERN DISTI	RICT OF CAL	IFORNIA
14	RALPH MILAN and ELIZABETH ARNOLD on behalf of themselves, those similarly situated and	Case No: 18-c	ev-02354-JD
15	the general public,		TION OF JACK FITZGERALD IN
16	Plaintiffs, v.	APPROVAL	OF MOTION FOR FINAL
17	CLIF BAR & COMPANY,	Judge:	Hon. James Donato
18	Defendant.	Hearing Date: Location:	: November 14, 2024, 10:00 a.m. Courtroom 11, 19th Floor
19 20			
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	Milan et al. v. Clif Bar of DECLARATION O		

I, Jack Fitzgerald, declare:

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I am a member in good standing of the State Bars of California and New York; and of the
 United States District Courts for the Northern, Central and Southern Districts of California, the Southern
 and Eastern Districts of New York, and the Western District of Wisconsin; and of the United States Courts
 of Appeal for the Second, Eighth, and Ninth Circuits. I make this declaration based on my own personal
 knowledge, in support of Plaintiffs' Motion for Final Approval.

7 2. I was Class Counsel in *Hadley v. Kellogg Sales Co.*, No. 16-cv-4955-LHK (N.D. Cal.). As
8 indicated in that action's Post-Distribution Accounting, *Hadley* Dkt. No. 410, payments to Class Member
9 claimants varied from between \$2.35 and \$89.94, with the median payment \$11.94 and the average payment
10 \$14.28.

I was also Class Counsel in *Krommenhock v. Post Foods, LLC*, No. 16-cv-4958-WHO (N.D.
 Cal.). As indicated in that action's Post-Distribution Accounting, *Krommenhock* Dkt. No. 306, payments to
 Class Member claimants varied from between \$3.29 and \$180.84, with the median payment \$16.42 and the
 average payment \$27.07.

Using conjoint analysis, Plaintiffs' damages experts, Steven Gaskin and Colin Weir,
 calculated a 3.8% price premium for Clif Bars' "Nutrition for Sustained Energy" claim, equivalent to 30¢
 for a \$7.99 six-pack of Clif Bars, or about 5¢ damages per bar. Plaintiffs' experts calculated damages of
 7.8% for Clif Kid Z Bar's ", equivalent to 53¢ for a \$6.79 six-pack of Clif Kid Z Bars, or 8.8¢ per bar.<sup>1</sup>

Discovery showed that, during the relevant time period, typical buy rates for the heaviest Clif
 Bar and Kid Z Bar users were just below 100 bars per year.

6. Plaintiffs' Motion for Attorneys' Fees, Costs, and Service Awards (Dkt. No. 262), and the supporting Declarations (Dkt. Nos. 262-1, 262-2, and 262-3) were publicly filed on September 6, 2024 and posted to the Settlement Website the same day. Class Members thus had full access to the motion for 46 days prior to the objection deadline, but no Class Member has objected to any aspect of the motion.

257. Professor Scott Dodson's objection (Dkt. No. 266, "Dodson Obj.") speculates proposed26potential *cy pres* recipient, the Resnick Center at UCLA School of Law, has disqualifying conflicts of

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<sup>&</sup>lt;sup>1</sup> The experts tested two additional claims for Z Bars, but each resulted in a lower premium.

interest because I spoke at an International Food Law Conference otherwise unaffiliated with the Resnick
 Center in San Francisco in 2020, which was co-chaired by Professor Michael T. Roberts, who is affiliated
 with the Resnick Center. *See* Dodson Obj. at 5. Professor Dodson speculates Professor Roberts could have
 "us[ed] conference funds to pay for [my] travel and lodging," in exchange for me "then steer[ing] *cy pres* funds to the Resnick Center." *Id.*

8. That is wrong. As is common with these types of conferences, I paid for my own travel and
lodging, and believe I also had to pay a registration fee, despite being a speaker. I have never received
anything of value from the Resnick Center, neither in exchange for steering *cy pres* to the Center, nor for
any other reason.

9. While I do not know what role Professor Roberts played regarding my speaking engagement at the 2020 International Food Law Conference, I was directly invited to speak at the Conference first in 2019, and then again in 2020, by my colleague, one of the program's co-chairs, Michael Reese, with whom I have occasionally co-counseled food law cases since 2010.<sup>2</sup> Mr. Reese recently advised me (because I asked in light of Professor Dodson's objection) that, because of the cases I filed against cereal manufacturers in 2016 (*i.e.*, *Hadley*, *Krommenhock*, and *Truxel*), the Conference had been considering inviting me since 2017, which was before Professor Roberts had become involved with the Conference.

10. 17 When I spoke at the Conference in 2020, these cases were a hot topic of discussion among 18 the relatively small and insular food law bar. That is why, as indicated in the brochure attached to Professor 19 Dodson's objection, my panel was titled "Credence Claims - Sugar." Notably, it was moderated by one of Clif's counsel in this case, Christopher Van Gundy. See Dodson Obj. Ex. A at 2. Another of Clif's counsel 20 21 here, Sascha Henry, was also a co-chair of the Conference. Id. at 1. On my panel was one of Post's defense 22 counsel in Krommenhock, Sarah Brew. Id. And another of Clif's present defense counsel, David Biderman, 23 spoke on a different panel. See id. at 2. Like these lawyers, several other lawyers speaking at the conference 24 have repeatedly defended similar cases my firm has filed involving health and wellness claims on sugary foods and beverages, including Dale Giali, Angela M. Spivey, and Kate T. Spelman. Thus, it is hardly 25 26 surprising I should be invited to speak at such a conference.

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<sup>28</sup> <sup>2</sup> See Rosen v. Unilever U.S., Inc., 2010 WL 4807100 (N.D. Cal. May 3, 2010).

1 11. The only other "association" I have with the Resnick Center, which is public knowledge, is 2 that it has been approved as a cy pres recipient in four other settlements my firm reached involving 3 misleading health and wellness claims on sugary foods and beverages: Hadley (by Judge Koh), 4 Krommenhock (by Judge Orrick), McMorrow (by the Southern District of California's Honorable Cynthia 5 A. Bashant), and Andrade-Heymsfield v. NextFoods, Inc., No. 21-cv-1446-BTM (by the Southern District of California's Honorable Barry Ted Moskowitz). But having settled dozens of class action cases over the 6 7 past 15 years, it has not been unusual for an entity to be chosen as a cy pres recipient across several similar 8 cases. For example, the American Heart Association, the National Advertising Division of the Better 9 Business Bureau, and Consumer Reports, have all been frequently approved as *cy pres* recipients in several of my firm's past class action settlements. 10

11 12. Professor Roberts' involvement as a co-chair in the International Food Law Conference 12 played no role in our decision on behalf of Plaintiffs and the Class to approve the Resnick Center as a 13 potential cy pres recipient in this case, which was not made alone, but in collaboration with Clif. The parties approved both recipients together, with the idea that Tufts produces food nutritionists and the Resnick 14 Center produces food lawyers, and thus each produces professionals concerned with the issues affecting 15 Class Members in this case. Moreover, with four courts having already approved the Resnick Center as an 16 appropriate cy pres recipient because it provides legal, governmental, and regulatory services and education 17 18 regarding food law, it made sense for the parties to select it again here, knowing it meets the legal standard 19 under Dennis.

Because, just like as with the AHA, NAD, and Consumer Reports, I have no association with
the Resnick Center and have never received anything of value from the Resnick Center, I do not believe its
approval as a *cy pres* recipient in previous similar settlements creates a conflict of interest here.

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I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.
Executed this 31st day of October, 2024, in San Diego, California

By: <u>/s/ Jack Fitzgerald</u> Jack Fitzgerald

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	DECLARATION OF BR		U

I, Brandon Schwartz, declare as follows:

1. I am the Director of Legal Notice for Postlethwaite & Netterville ("P&N")<sup>1</sup>, a full-service
administration firm providing legal administration services, including the design, development, and
implementation of unbiased complex legal notification programs.

5 2. In the Declaration of Brandon Schwartz Regarding Proposed Notice Plan and Administration In Support of Renewed Motion for Preliminary Approval ("Schwartz Declaration," Dkt. 253) 6 filed on October 31, 2023 and submitted along with my C.V., I detailed the proposed Notice Plan to 7 8 administer the claims process in the above-referenced matter (the "Action")<sup>2</sup>. As stated in the Schwartz 9 Declaration, P&N designed the Notice Plan to give notice to the Class Members in the most practicable manner possible. To do so, P&N designed, and the Court approved, a multifaceted approach utilizing a 10 11 combination of (1) print notice; (2) digital banner notice; (3) social media notice; (4) video notice; (5) 12 streaming TV notice; (6) streaming radio notice; (7) search advertising notice; (8) a press release; (9) CLRA 13 notice; (10) a Settlement Website; and (11) a toll-free hotline. Further, the Parties served subpoenas to the top four retailers of the Class Products-Walmart, Target, Kroger, and Amazon-to obtain contact 14 information necessary for providing substantial Direct Notice. Upon receiving the Class Members' contact 15 information from these retailers, P&N subsequently initiated Direct Notice by email. 16

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3. On July 12, 2024, the Court approved the Notice Plan, related notice forms, and appointed P&N as the Settlement Administrator in the *Order Re Preliminary Approval of Class Settlement* ("Preliminary Approval Order"). Preliminary Approval Order ¶ 8-12.

In the Preliminary Approval Order, the Court conditionally certified a Class defined as "[a]ll
 persons in the United States who, during the 'Class Period' as defined in Section 2.13 of the Settlement
 Agreement, purchased in the United States, for household use and not for resale or distribution, either
 original Clif Bars in packaging bearing the phrase 'Nutrition for Sustained Energy,' or Clif Kid ZBars in

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As of May 21, 2023, the Directors & employees of Postlethwaite & Netterville (P&N), APAC joined
 EisnerAmper as EAG Gulf Coast, LLC.

<sup>28 &</sup>lt;sup>2</sup> Capitalized terms used herein and not otherwise defined have the same meaning ascribed to them as in the Settlement Agreement, Dkt. No. 252-1.

packaging bearing the Challenged Claims (as identified in the Complaint in the Action)<sup>3</sup>."

5. Beginning on August 2, 2024, P&N began to implement the Notice Plan in accordance with
its requirements. This declaration will discuss the implementation of the Notice Plan and Settlement
Administration.

### **Notice Plan Summary**

### Class Action Fairness Act Notice ("CAFA")

7 6. On or about July 7, 2022, pursuant to 28 U.S.C. § 1715, P&N, on behalf of the Defendant, 8 caused notice of this Settlement and related materials to be sent to the Attorneys General of all U.S. states, 9 U.S. Territories, and Puerto Rico, as well as the Attorney General of the United States. On or about November 10, 2023, on behalf of the Defendant, P&N caused a supplemental CAFA notice to be sent to the 10 Attorneys General of all U.S. states, U.S. Territories, and Puerto Rico, as well as the Attorney General of 11 12 the United States, to provide updates regarding changes to the proposed Settlement. P&N has not received 13 any objection or any other response from any Attorney General. A copy of the CAFA Notices and mail list 14 are attached hereto as Exhibit A.

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### Direct Notice from Retailer Database

16 7. In the Preliminary Approval Order, the Court permitted Amazon to issue Class Notice
17 directly to Class Members for whom its records indicated a purchase of the Class Products during the Class
18 Period. We have been advised by Amazon that it successfully issued notice to 1,401,099 Class Members.

8. On or about September 3, 2024, Target provided sales and contact details for 11,474,362
 Class Members who purchased the Class Products from their online or retail stores. P&N de-duplicated the
 data records based on name and email address and determined that 3,176,888 unique Class Members existed.
 Further, P&N identified 2,988,558 Class Members with a valid email address sufficient to attempt notice
 ("Clif Bar Target Notice List").

9. To date, Kroger and Walmart have not provided contact data to P&N. We and Class Counsel
are in touch with these retailers. Walmart has stated that it expects to provide P&N the relevant information

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<sup>&</sup>lt;sup>27</sup>
<sup>3</sup> Excluded from the Settlement Class are: (a) Clif Bar's board members or executive-level officers including its attorneys; (b) governmental entities; (c) the Court, the Court's immediate family, and the Court's staff; and (d) any person that timely and properly excludes himself or herself from the Settlement Class.

around "the end of October." Kroger has not yet stated when it expects to provide the information but has
 represented it is in the process of pulling the relevant information. As soon as it is received, P&N will make
 further Direct Notice, and provide the Court updated claims information following the close of the claims
 period on November 25, 2024.

# **Email Notice and Direct Notice Results**

10. Beginning on October 7, 2024, P&N caused the Short-form Class Notice to be sent via email
("Email Notice") to the 2,988,558 deliverable email addresses on the Clif Bar Target Notice List. Ultimately,
the Email Notice was successfully delivered to 2,923,941 email addresses, or 97.84% deliverability. <sup>4</sup> A true
and correct copy of the Email Notice is attached hereto as Exhibit B. Table 1 below provides an overview
of the dissemination results and reach statistics for the Clif Bar Target Notice List.

Table 1		
Direct Notice Program Dissemination & Reach - Target		
Description	Clif Bar Target Notice List	Percentage of Clif Bar Target Notice List
Class Members	3,176,888	100.00%
Email Notice		
Total Email Notices Sent	2,988,558	94.07%
(-) Total Email Notices Bounced/Undelivered	64,617	2.03%
Direct Notice Program Reach		
Total Received Direct Notice	2,923,941	92.04%

### **Print** Notice

20 11. Pursuant to the Order, P&N caused the Short-form Class Notice to be published in the
21 September 2, 2024 edition of *US Weekly* magazine. A copy of the Short-form Class Notice as it appeared in
22 *US Weekly* magazine is attached as **Exhibit C**.

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# **Digital Advertising Notice**

12. Pursuant to the Preliminary Approval Order, P&N caused digital banner notices to run across
a network of sites, as well as Facebook and Instagram. A 30-second and 15-second digital video notice was
also developed and displayed on TikTok, Facebook, Instagram, and YouTube. Digital notices were targeted

<sup>28 &</sup>lt;sup>4</sup> A Class Member is considered "reached" by Direct Notice if an Email Notice was successfully sent to the Class Member and was not returned as undeliverable.

to individuals in accordance with the Schwartz Declaration (¶21) and allowed website visitors to identify themselves as potential Class Members and click through to the Settlement Website. Additionally, the banner notices were translated into Spanish and appeared on language appropriate websites and/or served to users that chose Spanish as their preferred browser language. More than 451,472,582 impressions were generated during the campaign, which was 20,822,582 more than described in the Schwartz Declaration.

#### Streaming TV

8 13. Pursuant to the Preliminary Approval Order, P&N caused the video notice to run across 9 various platforms and apps/stations such as AMC, MLB, and ESPN, among others, and apps that aggregate 10 content such as Pluto TV, DirecTV, Sling TV, Plex, LG Channel Plus, and fuboTV, among others. The 30-11 second and 15-second video notice ran in English, achieved a 93% video completion rate, and generated 12 2,038,455 impressions during the campaign, which was 50,625 more than had been described in the 13 Schwartz Declaration. The TV script is attached as **Exhibit E**.

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#### Streaming Radio

14. Pursuant to the Preliminary Approval Order, P&N developed 15-second and 30-second radio 15 notices, along with a companion banner, and caused the radio notices to be broadcast via Spotify streaming 16 17 radio. The radio notices were targeted to workout categories, playlists, and podcasts, including but not 18 limited to: 20 Minute Fitness, Fitness Playlist, Mind Pump, Fitness Motivation, Fit Beats, and Outdoor. 19 During the airing of the radio notice, a companion banner may have appeared on the user's device. Both the 20 15-second and 30-second radio notices, along with the accompanying banner, were presented in English. 21 The campaign generated 2,145,237 impressions from streaming radio and companion banners, which exceeded the estimate in the Schwartz Declaration by 773,237 impressions. Screenshots of the radio notice 22 23 and companion banner are attached as Exhibit F.

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#### Search Advertising

Pursuant to the Preliminary Approval Order, P&N caused notice to appear by sponsored
search advertising via Google Ads. Sponsored search ads appeared in the search results field on Google.com.
Keywords related to the litigation were used to prompt the sponsored search ads, such as: "Clif Bar," "Clif
Kid Zbars," "Clif Bar Class Action," and "Clif Bar lawsuit," among others. In total, 29,539 impressions

were generated. Screenshots of the sponsored search ads are attached in **Exhibit G**.

#### **Press Release**

16. Pursuant to the Preliminary Approval Order, on August 5, 2024, P&N disseminated a nationwide news release over Cision's PR Newswire US1 and Hispanic newslines in English and Spanish announcing the Settlement. The release resulted in 588 pickups by media outlets and a total potential audience of 119,000,000. A copy of the release in English and Spanish as well as the visibility report is attached as Exhibit H.

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### California Consumer Legal Remedies Act ("CLRA")

17. To satisfy CLRA requirements, P&N caused the Short-form Class Notice to be published once a week for four consecutive weeks in USA Today - California/Arizona region. The Short-form Class Notice appeared in the August 16, 2024, August 23, 2024, August 30, 2024, and September 6, 2024, editions. 12 A copy of the Short-form Class Notice as it appeared in each edition is attached as Exhibit I.

#### Settlement Website

14 18. On August 2, 2024, P&N took the Settlement Website, www.BarsClassAction.com, live. Visitors to the Settlement Website can download the Class Notices (available in English and Spanish), the 15 Claim Form (online and mail versions available in English and Spanish), and court documents such as the 16 17 Class Action Complaint (Dkt. No. 1) and Settlement Agreement. Visitors can also access motions filed by 18 Class Counsel, including the Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class 19 Settlement (Dkt. No. 251), Plaintiffs' Notice of Motion and Motion for Attorneys' Fees, Costs, and Service 20 Awards (Dkt. No. 262), as well as Court orders, including the Preliminary Approval Order (Dkt. No. 261). 21 Visitors are also able to electronically submit Claims, documentation, address updates, find answers to frequently asked questions ("FAQs"), important dates and deadlines, and contact information for the 22 23 Settlement Administrator.

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19. As of October 31, 2024, the Settlement Website has received 14,778,153 page views from 6,963,160 unique visitors.

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### **Dedicated Toll-Free Hotline**

20. P&N also established a toll-free hotline, 1-844-537-1156, dedicated to this Settlement. The 27 toll-free hotline is accessible 24 hours per day, seven days per week, and utilizes an interactive voice 28

response (IVR) system where Class Members can obtain essential information regarding the Settlement and
 get responses to FAQs. Class Members have the option to leave a voicemail and receive a call back from
 the Settlement Administrator. The toll-free hotline appeared in the Class Notices and in multiple locations
 on the Settlement Website.

5 21. As of October31, 2024, the toll-free hotline has received 344 calls and 145 voicemails,
6 totaling 1,099 minutes.

#### **Email Support**

8 22. P&N established the email address, info@BarsClassAction.com, to provide email support,
9 allowing Class Members to direct specific questions and requests to the Settlement Administrator. The email
10 address is included in the Class Notices and displayed on the Settlement Website. As of October 31, 2024,
11 P&N has responded to 567 emails.

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#### Settlement P.O. Box

P&N maintains a designated P.O. Box for the administration of the Settlement: Bars Class
Action Administrator, P.O. Box 671, Baton Rouge, LA 70821. P&N monitors the Settlement P.O. Box for
Settlement-related mail such as Claim Forms, exclusion requests, and inquiries about the Settlement. P&N
promptly handles all mail received at the Settlement P.O. Box.

17 24. As of October 31, 2024, P&N has received 237 pieces of administrative mail through the
18 P.O. Box.

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### **Claim Form Submissions and Fraud Analysis**

#### Overview

21 25. Class Members have the option of submitting Claims online or mailing the printed Claim 22 Form to the Settlement Administrator. The online Claim Form feature was available on the Settlement 23 Website beginning August 2, 2024 along with the downloadable Claim Form. The online Claim Form 24 requires Class Members to provide their preferred method of contact information, information about their 25 purchase history (optionally including documentation, if available), and a certification of the truthfulness of 26 the information contained in the Claim Form. As part of the Claims Process, Class Members have the option 27 to select their preferred payment method via check or digital payment, such as by Venmo, Zelle, PayPal,

Digital MasterCard,<sup>5</sup> or ACH.

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# Summary of Submitted Claims

26. As of October 31, 2024, P&N has received 322,713 valid Claim submissions, 31,730 of
which contained documentation, accounting for 427,517,670 total products claimed. Additionally, 250,085
valid Claimants (77. 5%) have elected to receive a digital payment. P&N shall continue to intake and analyze
Claims through the filing deadline of November 25, 2024, and provided updated claims information to the
Court as requested by Class Counsel. Table 2 below provides summary statistics of Claim submissions and
current dispositions.

Table 2Claims Statistics Summary (as of October 31, 2024)	
Description	Volume (#)
Non-Documented Claims Received	4,695,540
Documented Claims Received	49,784
Total Claims Received	4,745,324
(-) Duplicate Claims	56,323
(-) Household Duplicate Claims	41,002
(-) Invalid Claims: High Confidence Fraud	4,016,475
(-) Invalid Claims: Suspected Fraud	308,811
Net Claims Received	322,713

### Fraud Procedures and Analysis

To combat rampant fraud in class action settlements and protect the interests of valid 27. 19 claimants, P&N employs a cutting-edge, three-tiered defense strategy that combines industry-leading 20 technologies with human oversight. P&Ns first line of defense is an advanced machine learning supported 21 Web Application Firewall ("WAF"). This WAF is continuously updated in real-time based on insights from 22 the global network, ensuring proactive protection against emerging threats. The second tier of P&N's 23 defense utilizes sophisticated AI algorithms to detect and mitigate bot and scripted browser traffic, 24 effectively distinguishing between legitimate and malicious activities to prevent attacks like credential 25 stuffing in real-time. These algorithms compare data across all active case websites allowing us to identify 26

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<sup>&</sup>lt;sup>28</sup> <sup>5</sup> In instances where a Class Member has elected to receive a MasterCard digital payment, P&N does not engage in any form of revenue sharing, such as profiting from inactivity fees or unredeemed balances.

patterns and bad actors across tens of millions of website interactions. Our third and most comprehensive
line of defense involves a team of dedicated fraud prevention specialists who employ a proprietary, multifaceted approach. This includes AI-powered fuzzy matching to identify abnormal patterns indicative of
fraud, digital fingerprint verification, and comprehensive monitoring of suspicious IPs and domains across
all cases. By leveraging technology, we ensure that our fraud mitigation practices not only meet but exceed
industry standards.

7 28. The findings from the claims analysis, as presented in Table 2 above, categorize all Claims
8 into four distinct tiers: duplicate Claims, household duplicate Claims, high-confidence fraudulent Claims,
9 and suspected fraudulent Claims.

10 29. Duplicate Claims: Defined as two or more Claims submitted with the same name and
11 address. In instances of duplicate claims, P&N counts only the Claim with the highest calculated base
12 refund.

30. Household Duplicate Claims: Defined as two or more Claims that have the same mailing
address or digital payment account information. In instances where there were household duplicate Claims,
P&N counted only the Claim with the highest calculated base refund. Additionally, P&N will send a notice
to each Claim within a duplicate household, which will provide the Claimant the opportunity to submit
documentation to demonstrate that the units claimed do not overlap.

18 31. High Confidence Fraud Invalid Claims: Consist of Claims identified by P&N and its partners that exhibit known characteristics of automated Claim submissions and other indicators of abuse. 19 These characteristics include Claims where (1) the same IP address appears more than twenty (20) times, 20 21 (2) Claims identified by hCaptcha<sup>6</sup> as a verified bot submission, (3) the email address associated with the Claim is either included in a database maintained by P&N or its partners of known fraudulent email 22 23 addresses or registered with a foreign Email Service Provider and the Claimant has elected to receive a 24 settlement payment as a digital payment to the known fraudulent email, (4) the IP is registered to a foreign Internet Service Provider, and/or (5) Claims that appear to be unrelated to each other with a request to be 25

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<sup>6</sup> hCaptcha provides the industry's most accurate bot detection through its class-leading adaptive challenge
 platform and online learning capabilities. Its advanced network of machine learning algorithms ensures that
 bots are reliably detected and trains in real-time to identify and mitigate the latest threats. *See* www.hcaptcha.com.

paid using the same digital payment account information. Many of the Claims identified as high confidence fraud exhibit multiple characteristics described above. Claims flagged as high confidence fraud will be denied and will not receive notice.

32. Suspected Fraud Invalid Claims: Consists of Claims identified by P&N and its partners
with indicators that suggest that the Claim is likely fraudulent. These indicators include (1) the IP address
associated with the Claim appears between six (6) and twenty (20) times, (2) the Claim was submitted with
a suspicious email address and selected a digital payment as the preferred payment method, and/or (3)
hCaptcha identified the Claim as a possible bot submission.

9 33. P&N will send a notice to each Suspected Fraud Claim informing the Claimant that
additional information is required to verify their Claim. The notice will provide instructions for verifying
the Claim, and any Claim that is not verified by the deadline provided will be denied. Suspected Fraud
Claimants will have 21 days to complete the verification process. P&N will send a reminder email to those
Claimants who have not verified their Claim at least seven (7) days prior to the deadline.

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### **Notice and Administration Expenses**

As of October 31, 2024, P&N has incurred \$439,589.44 in fees and costs completing the
Notice Plan and administering the Settlement, and anticipates incurring \$258,025.60 in additional fees and
costs for administration for a total cost of \$697,615.04 for the Notice Plan and Settlement Administration.<sup>7</sup>
Table 3 below provides an overview of the Notice and Administration Costs.

Table 3		
Notice and Administration Expense Summary		
Claims Administration & Distribution	\$240,061.03	
Postage	\$67,081.00	
Cost of Administration	\$307,142.03	
Cost of Notice	\$390,473.01	
Total Notice & Administration	\$697,615.04	

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P&N incurred some unanticipated notice costs in connection with processing class member data provided by Target, and is estimating costs for processing additional class member data anticipated to come from Wal-Mart and Kroger. To be conservative, based on the Target data, P&N is making an assumption that it will receive and need to process for direct notice information 6 million class member from these retailers. If the amount of data those retailers provide is less, P&N's costs will be less than estimated here.

#### **Settlement Fund Summary**

35. If the Court awards the requested attorneys' fees, costs, incentive awards, and administrative costs (as outlined in Paragraph 34 above), the Settlement Class recovery amount will be \$6,831,047.96 as shown in Table 4 below.

<u>Table 4</u>		
Settlement Fund Summary (as of October 31, 2024)		
Total Settlement Fund	\$12,000,000.00	
(-) Attorney's Fees & Expenses	\$4,461,337.00	
(-) Service Awards	\$10,000.00	
(-) P&N Admin Fees	\$697,615.04	
Net Settlement Fund Available for Pro Rata	\$6,831,047.96	

1036. The Settlement Agreement provides that valid Claims, whether or not Proof of Purchase is11provided, would initially (before any necessary *pro rata* adjustment) be awarded an allocation of \$5.00 for12up to 30 Class Products purchase, \$10.00 for 31 to 60 Class Products purchased, and \$15.00 for more than1360 Class Products purchased. Additionally, the Settlement Agreement provided that valid Claims with Proof14of Purchase would be initially be awarded an allocation of \$15.00 for the first 60 Class Products plus twenty-15five cents (\$0.25) for each additional Class Product up to a maximum recovery of fifty dollars (\$50.00).

16 37. The total value of approved Claims currently falls short of the funds available for distribution 17 to Class Members; therefore, pending final claims numbers, cash awards are likely to be increased pro rata 18 to exhaust all funds available for distribution to Claimants. After pro rata adjustment, the current allocation 19 of Class Products is estimated to be \$6.30 for up to 30 Class Products purchased, \$12.60 for 31 to 60 Class 20 Products purchased, and \$19.20 for more than 60 Class Products purchased; and Claims with Proof of 21 Purchase, \$19.20 for the first 60 Class Products plus thirty-two cents (\$0.32) for each additional Class 22 Product. As of October 31, 2024, P&N anticipates an overall average payment of \$20.72. Table 5 below 23 provides a summary of the award allocation as of October31, 2024.

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Award Allocation Summary (as of October 31, 2024)			
Description	Claim Volume (#)	Amount (\$)	
Up to 30 Bars	21,508	\$135,500.40	
Between 31 – 60 Bars	21,466	\$270,471.60	
More than 60 Bars (No Documentation)	248,189	\$4,765,228.80	
More than 60 Bars (Documentation)	31,550	\$1,515,467.92	
Total <sup>8</sup>	322,713	\$6,686,668.72	

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#### **Objections and Exclusions**

38. The deadline for Class Members to ask to be excluded from the Settlement was October 22, 2024. To date, P&N has received ninety-three (93) timely, valid exclusions, which have been provided to the parties in this Action. A list of the Class Members requesting to be excluded are attached as **Exhibit J**. 39. The Preliminary Approval Order directs Class Members to file objections with the Court. P&N has not received any objections directly.

#### Conclusion

40. In class action notice planning, execution, and analysis, we are guided by due process considerations under the United States Constitution and by case law pertaining to the recognized notice standards under Federal Rules of Civil Procedure, Rule 23 ("FRCP 23"). This framework directs that a notice plan be optimized to reach the class and, in a settlement notice situation such as this, that the notice or notice plan itself not omit any material information regarding legal rights—or the ability to exercise other options-to class members in any way. All of these requirements were met in this case, and in my opinion, the above-described Notice Plan was consistent with other effective class action notice programs.

41. In total, the Notice Plan achieved a reach of more than 80% with an average frequency of 2.5. The measurable reach does not include the email notice to the Clif Bar Target Notice List or Amazon's Direct Notice to the identified purchasers of the Class Products. Additionally, the measurable reach does not account for CLRA, the Settlement Website, toll-free hotline, or press release, as these media channels 26 are difficult to quantify. However, all of these components enhance the overall reach and frequency of the

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<sup>&</sup>lt;sup>8</sup> The variance from the net settlement fund available for pro rata is due to the rounding of the cash awards to the nearest penny.

Notice Plan.

42. It is my opinion, based on my expertise and experience and that of my team, that the methods
of notice dissemination implemented by this Settlement, and the Court's Preliminary Approval Order,
provided effective notice of the Settlement, provided the best notice that is practicable, adhered to FRCP
23, followed the guidance set forth in the Manual for Complex Litigation 4th Ed. and Federal Judicial Center
(FJC) guidance, and met the requirements of due process, including its "desire to actually inform"
requirement. Moreover, the Notice Plan schedule afforded enough time to provide full and proper notice to
Class Members before the Claims, Opt-Out, and Objection Deadlines.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge
and belief. Executed this 31st day of October 2024 in Portland, Oregon.

Brandon Schwartz



EAG Gulf Coast, LLC

Exhibit A: CAFA Notice



A Professional Accounting Corporation

July 6, 2022

# **By Certified Mail**

Federal and State Officials as listed in Attachment 1

**Re: NOTICE UNDER THE CLASS ACTION FAIRNESS ACT OF 2005, 28 U.S.C. § 1715(b),** *Ralph Milan, et al. v. Clif Bar & Company, Case No. 18-cv-02354-JD (N.D. Cal.)* 

Dear Sir or Madam:

I send this letter and the enclosed disc to you on behalf of the Parties to the action referenced above (the "Parties") regarding the Motion for Preliminary Approval of a Class Action Settlement filed on June 23, 2022. This communication constitutes the notice required by the Class Action Fairness Act of 2005, 28 U.S.C. § 1715(b) ("CAFA").

The proposed settlement resolves the class action lawsuit brought by Ralph Milan and Elizabeth Arnold ("Plaintiffs") against Clif Bar & Company ("Defendant") alleging that the Defendant violated consumer protection laws in labeling certain bars with claims that made the products seem healthy, when Plaintiffs allege they were in fact unhealthy due to their added sugar content. Clif Bar denies any wrongdoing of any kind and maintains that its products are not unhealthy due to added sugar content and that the statements on its bars' labels are true and not misleading. The specific products included in the Settlement are original Clif Bars and Clif Kid Zbars in packaging that bears claims identified as "Challenged Claims" in the Complaint.

In accordance with 28 U.S.C. § 1715(b), the enclosed disc includes:

- a. Exhibit 1: A copy of the Class Action Complaint filed on April 19, 2018;
- b. Exhibit 2: A copy of Defendant's Answer to the Complaint filed on September 30, 2019;
- c. Exhibit 3: A copy of the Plaintiffs' Motion for Preliminary Approval of Class Action Settlement file on June 23, 2022;
- d. Exhibit 4: The Settlement Agreement filed with the Court on June 23, 2022, including the proposed Long-form Notice and Short-form Notice, Proposed Order Granting Motion for Final Approval of Class Settlement, and Proposed Order Granting Motion for Preliminary Approval of Class Settlement attached as Exhibits 1-4 to the Settlement Agreement; and
- e. Exhibit 5: A copy of the corrected Proposed Order Granting Plaintiffs' motion for preliminary approval filed on June 24, 2022.

A hearing on Plaintiffs' Motion for Preliminary Approval of the Class Action Settlement is scheduled for July 28, 2022 at 10:00 a.m. before the Honorable James Donato of the United States District Court for the Northern District of California, 450 Golden Gate Ave. 16<sup>th</sup> Floor, San Francisco, CA, 94102. No other hearings have yet been scheduled.

Under 28 U.S.C. §§ 1715(b)(7)(A)-(B), CAFA requires that a defendant, "if feasible," must provide "the names of class members who reside in each State and the estimated proportionate share of the claims of such members to the entire settlement," or "if not feasible, a reasonable estimate of the number of class members residing in each State and the estimated proportionate share of the claims of such members to the entire settlement."



A Professional Accounting Corporation

In this matter, it is not feasible to identify the Settlement Class Members who reside in each state due to the ubiquitous nature of the Class Products and the number of retail outlets through which they are sold. With respect to Class Members' share of claims, the estimated average Cash Award is approximately \$10.60 depending on claimant's purchase history and estimated number of claims made. The actual amount of the Settlement Payment per product each claimant receives is subject to a pro rata increase or decrease if the value of the claims is less or more than the Settlement Fund after other Settlement Expenses are deducted.

There are no other agreements between Class Counsel and counsel for Defendant, there are no final judgments in this matter, and there are no written judicial opinions relating to the materials described under 28 U.S.C. §§ 1715(b)(3)-(6).

Thank you for your attention to this matter. If you have any question about this notice or the enclosed materials, please contact us.

Sincerely,

Ryan Aldridge Postlethwaite & Netterville, Class Administrator

Enclosures

cc by email:

FITZGERALD JOSEPH LLP Jack Fitzgerald jack@fitzgeraldjoseph.com Paul K. Joseph paul@fitzgeraldjoseph.com Melanie Persinger melanie@fitzgeraldjoseph.com Trevor M. Flynn trevor@fitzgeraldjoseph.com Caroline S. Emhardt caroline@fitzgeraldjoseph.com 2341 Jefferson Street, Suite 200 San Diego, CA 92110 Phone: (619) 215-1741

Class Counsel

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP Christopher Van Gundy cvangundy@sheppardmullin.com Jay T. Ramsey



Case 3:18-cv-02354-JD Document 268-3 Filed 10/31/24 Page 4 of 109 8550 United Plaza Blvd., Ste. 1001 – Baton Rouge, LA 70809 225-922-4600 Phone – 225-922-4611 Fax – pncpa.com

A Professional Accounting Corporation

jramsey@sheppardmullin.com Khirin A. Bunker kbunker@sheppardmullin.com Phone: (415) 434-9100 Fax: (415) 434-3947

Counsel for Defendant Clif Bar & Co.



A Professional Accounting Corporation

November 10, 2023

# **By Certified Mail**

Federal and State Officials as listed in Attachment 1

Re: NOTICE UNDER THE CLASS ACTION FAIRNESS ACT OF 2005, 28 U.S.C. § 1715(b),

Ralph Milan et al. v. Clif Bar & Co., Case No. 18-cv-02354-JD (N.D. Cal.)

Dear Sir or Madam:

I send this letter and the enclosed disc to you on behalf of the Parties to the action referenced above (the "Parties") regarding the Motion for Preliminary Approval of a Class Action Settlement filed on October 31, 2023. This letter supplements the CAFA notice previously sent to you on or about July 6, 2022 and constitutes the notice required by the Class Action Fairness Act of 2005, 28 U.S.C. § 1715(b) ("CAFA").

The proposed settlement resolves the class action lawsuit brought by Ralph Milan and Elizabeth Arnold ("Plaintiffs") against Clif Bar & Company ("Defendant") alleging that the Defendant violated consumer protection laws in labeling certain bars with claims that made the products seem healthy, when Plaintiffs allege they were in fact unhealthy due to their added sugar content. Clif Bar denies any wrongdoing of any kind and maintains that its products are not unhealthy due to added sugar content and that the statements on its bars' labels are true and not misleading. The specific products included in the Settlement are original Clif Bars and Clif Kid Zbars in packaging that bears claims identified as "Challenged Claims" in the Complaint.

In accordance with 28 U.S.C. § 1715(b), the enclosed disc includes:

- a. Exhibit 1: A copy of the Class Action Complaint filed on April 19, 2018;
- b. Exhibit 2: A copy of Defendant's Answer to the Complaint filed on September 30, 2019;
- c. Exhibit 3: A copy of the Plaintiffs' Motion for Preliminary Approval of Class Action Settlement file on October 31, 2023;
- d. Exhibit 4: The Settlement Agreement filed with the Court on October 31, 2023, including the proposed Long-form Notice and Short-form Notice, Proposed Final Judgment and Order Granting Motion for Final Approval of Class Settlement, and Proposed Order Granting Motion for Preliminary Approval of Class Settlement attached as Exhibits 1-5 to the Settlement Agreement

A hearing on Plaintiffs' Motion for Preliminary Approval of the Class Action Settlement is scheduled for December 14, 2023, at 10:00 a.m. before the Honorable James Donato of the United States District Court for the Northern District of California, 450 Golden Gate Ave., Courtroom 11, 19<sup>th</sup> Floor, San Francisco, CA, 94102. No other hearings have yet been scheduled.

Under 28 U.S.C. §§ 1715(b)(7)(A)-(B), CAFA requires that a defendant, "if feasible," must provide "the names of class members who reside in each State and the estimated proportionate share of the claims of such members to the entire settlement," or "if not feasible, a reasonable estimate of the number of class members residing in each State and the estimated proportionate share of the claims of such members to the entire settlement."



A Professional Accounting Corporation

In this matter, it is not feasible to identify the Settlement Class Members who reside in each state due to the ubiquitous nature of the Class Products and the number of retail outlets through which they are sold. With respect to Class Members' share of claims, the estimated average Cash Payment is approximately \$29.78 depending on claimant's purchase history and estimated number of claims made. The actual amount of the Cash Payment per product each claimant receives is subject to a pro rata increase or decrease if the value of the claims is less or more than the Settlement Fund after other Settlement Costs are deducted.

There are no other agreements between Class Counsel and counsel for Defendant, there are no final judgments in this matter, and there are no written judicial opinions relating to the materials described under 28 U.S.C. §§ 1715(b)(3)-(6).

Thank you for your attention to this matter. If you have any question about this notice or the enclosed materials, please contact us.

Sincerely,

Jordan Auror

Jordan Turner Postlethwaite & Netterville<sup>1</sup>, Settlement Administrator

Enclosures

cc by email:

FITZGERALD JOSEPH LLP Jack Fitzgerald jack@fitzgeraldjoseph.com Paul K. Joseph paul@fitzgeraldjoseph.com Melanie Persinger melanie@fitzgeraldjoseph.com Trevor M. Flynn trevor@fitzgeraldjoseph.com Caroline S. Emhardt caroline@fitzgeraldjoseph.com 2341 Jefferson Street, Suite 200 San Diego, CA 92110 Phone: (619) 215-1741

Class Counsel

PERKINS COIE LLP David T. Biderman dbiderman@perkinscoie.com Phone: (415) 344-7000 Jasmine W. Wetherell jwetherell@perkinscoie.com Phone: (310) 788-9900

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP Christopher Van Gundy cvangundy@sheppardmullin.com Jay T. Ramsey jramsey@sheppardmullin.com Khirin A. Bunker kbunker@sheppardmullin.com Phone: (415) 434-9100 Fax: (415) 434-3947

Attorneys for Defendant Clif Bar & Company

<sup>&</sup>lt;sup>1</sup> As of May 21, 2023, the Directors & employees of Postlethwaite & Netterville (P&N), APAC joined EisnerAmper as EAG Gulf Coast, LLC. Where P&N is named as an entity, EAG Gulf Coast, LLC employees will service work contracted with P&N.

		<b>CAFA Notice Service List</b> Milan et al. v. Clif Bar & Co., No. 18-cv-02354					
Name1	Name2	Address1	Address2	Address3	City	State	Zip
Office of the Attorney General		1031 W. 4th Avenue, Suite 200	, Addi Cose		Anchorage	AK	99501-1994
Office of the Attorney General		501 Washington Avenue	PO Box 300152		Montgomery	AL	36104
Office of the Attorney General		323 Center Street, Suite 200			Little Rock	AR	72201-2610
Office of the Attorney General		PO Box 7			Pago Pago	AS	96799
Office of the Attorney General		2005 N Central Ave			Phoenix	AZ	85004-2926
Office of the Attorney General	CAFA Coordinator, Consumer Law Section	455 Golden Gate Avenue, Suite 11000			San Francisco	CA	94102
Office of the Attorney General		Ralph L. Carr Colorado Judicial Center	1300 Broadway, 10th Floor		Denver	CO	80203
Office of the Attorney General		165 Capitol Avenue	1500 Diodaway, 15th 1601		Hartford		06106
Office of the Attorney General		441 4th Street NW, Suite 1100S			Washington	DC	20001
United States Office of the Attorney General	US Department of Justice	950 Pennsylvania Ave, NW			Washington	DC	20530-0001
Office of the Attorney General		820 North French Street	6th Floor		Wilmington	DE	19801
Office of the Attorney General		The Capitol	PL-01		Tallahassee	FI	32399-1050
Office of the Attorney General		40 Capitol Square SW			Atlanta	GA	30334
Office of the Attorney General	Administrative Division	590 S. Marine Corps Dr., Suite 901			Tamuning	GU	96913
Department of the Attorney General		425 Queen Street			Honolulu	<u>- 00</u> ні	96813
Office of the Attorney General		Hoover State Office Building	1305 East Walnut Street		Des Moines		50319
Office of the Attorney General		954 West Jefferson Street, 2nd floor	PO Box 83720		Boise		83720-0010
Office of the Attorney General		100 West Randolph Street	FO B0X 83720		Chicago		60601
Office of the Attorney General		Indiana Government Center South	302 West Washington Street, 5th Floor		Indianapolis	IN	46204
Office of the Attorney General		120 SW 10th Ave, 2nd Floor	Soz west washington screet, stil Ploor		Topeka	KS	66612-1597
Office of the Attorney General		700 Capitol Avenue, Suite 118			Frankfort	KY KY	40601-3449
		PO Box 94005				_	70804
Office of the Attorney General Office of the Attorney General	ATTN: CAFA Coordinator/General Counsel's Office	One Ashburton Place			Baton Rouge	LA MA	02108
Office of the Attorney General	ATTN: CAFA Coordinator/General Couriser's Office	200 St. Paul Place			Boston Baltimore	MD	21202
Office of the Attorney General		6 State House Station			_	ME	04333
		G. Mennen Williams Building	E2E West Ottown Street	DO Dov 20212	Augusta		48909
Office of the Attorney General		445 Minnesota Street, Suite 1400	525 West Ottawa Street	PO Box 30212	Lansing	MN	
Office of the Attorney General Office of the Attorney General			207 West High Street		St Paul Jefferson City	MO	55101-2131 65102
· · ·		Supreme Court Building	207 West High Street			_	96950
Office of the Attorney General		Administrative Building Walter Sillers Building	PO Box 10007		Saipan Jackson	MP MS	39201
Office of the Attorney General Office of the Attorney General			550 High Street, Suite 11 215 North Sanders		Helena	MT	59601
·	ATTN: Concurrent Destantion	Justice Building Third Floor	215 North Sanders				
Office of the Attorney General	ATTN: Consumer Protection	114 West Edenton Street	COO Fast Deuloverd Avenue, Dant 125		Raleigh	NC	27603 58505
Office of the Attorney General		State Capitol	600 East Boulevard Avenue, Dept. 125		Bismarck	ND	68509
Office of the Attorney General		2115 State Capitol	PO Box 98920		Lincoln	NE	
Office of the Attorney General		33 Capitol Street			Concord	NH	03301
Office of the Attorney General	ATTN: Farrah Diaz Darahasal	RJ Hughes Justice Complex	25 Market Street	PO BOX 080	Trenton		08625-0080
Office of the Attorney General	ATTN: Farrah Diaz, Paralegal	201 3rd St NW, Suite 300	100 North Correct Street		Albuquerque	NM	87102
Office of the Attorney General		Old Supreme Court Building	100 North Carson Street		Carson City	NV	89701
Office of the Attorney General		The Capitol			Albany	NY	12224-0341
Office of the Attorney General		State Office Tower	30 East Broad Street, 14th Floor		Columbus	ОН	43215
Office of the Attorney General	Ourses Deserves of heating	313 NE 21st Street			Oklahoma City	OK	73105
Office of the Attorney General	Oregon Department of Justice	1162 Court Street NE			Salem	OR	97301-4096
Office of the Attorney General		16th Floor, Strawberry Square			Harrisburg	PA	17120
Office of the Attorney General		PO Box 9020192			San Juan	РК	00902-0192
Office of the Attorney General	ATTN: Lisa Pinsonneault/CAFA Notice	150 South Main Street			Providence	KI CC	02903
Office of the Attorney General		PO Box 11549			Columbia	SC	29211-1549
Office of the Attorney General		1302 E. Highway 14, Suite 1			Pierre		57501-8501
Office of the Attorney General and Reporter		PO Box 20207	DO D-0 12512		Nashville		37202
Office of the Attorney General		Capitol Station	PO Box 12548		Austin		78711-2548
Office of the Attorney General		Utah State Capitol Complex	350 North State Street, Suite 230		Salt Lake City	UT	84114-2320
Office of the Attorney General		202 North Ninth Street			Richmond	VA	23219
Office of the Attorney General		34-38 Kronprindsens Gade	Gers Building, 2nd Floor		St Thomas	VI	00802
Office of the Attorney General		109 State Street			Montpelier	VT	05609
Office of the Attorney General		1125 Washington Street SE	PO Box 40100		Olympia	WA	98504-0100
Office of the Attorney General	Wisconsin Department of Justice	PO Box 7857			Madison	WI	53707-7857
Office of the Attorney General		State Capitol	Building 1, Room E-26		Charleston	WV	25305
Office of the Attorney General		Kendrick Building	2320 Capital Avenue		Cheyenne	WY	82002



EAG Gulf Coast, LLC

Exhibit B: Email Notice

Subject: Notice of Settlement - Ralph Milan et al. v. Clif Bar & Company From: Bars Class Action Administrator notice@pnclassaction.com Reply-To: info@barsclassaction.com To: Test@email.com

# LEGAL NOTICE

Ralph Milan et al. v. Clif Bar & Company, Case No. 18-CV-2354-JD (N.D. Cal.)

# If You Purchased Certain Clif Bar Products Since April 2014 You Could Receive a Cash Payment as Part of a Class Action Settlement

# Visit www.BarsClassAction.com to file a claim by November 25, 2024.

# What is the lawsuit about?

The lawsuit contends that Clif Bar & Company ("Clif Bar") made certain statements on the labels of various original Clif Bars and Clif Kid ZBars ("Class Products") that are allegedly misleading because the statements suggested the bars are healthy, whereas Plaintiffs allege the bars are unhealthy because of their added sugar. Clif Bar maintains that these products are not unhealthy due to the presence of added sugars, and that the statements on its bars are true and not misleading. The Court has not determined whether Plaintiffs or Clif Bar is correct. The parties have agreed to a Settlement, which will allow both sides to avoid the risk and cost of further litigation.

### Who is included?

You are a Class Member if you bought one of the Class Products for household use, and not for resale or distribution, between April 2014 and March 2023 in California or New York, or between March 2019 and March 2023 in any other State. The Class Products include Original Clif Bars in packaging stating "Nutrition for Sustained Energy," and Clif Kid ZBars in packaging stating "Nourishing Kids in Motion" and similar Challenged Claims (as identified in the Complaint in the Action).

# What does the settlement provide?

Clif Bar has agreed pay \$12,000,000 to settle the case and pay all Settlement expenses, including the costs of class notice and administration, attorneys' fees and costs, service awards for the Class Representatives, and cash refunds for Class Members who make valid Claims. Your legal rights will be affected if you are a Class Member and do not exclude yourself.

### What are your options?

**Submit A Claim:** To receive Settlement benefits, you must complete and submit a Claim Form. Claim Forms are available at the Settlement Website, <u>www.BarsClassAction.com</u>, and can be submitted electronically or mailed to the Class Administrator. A Claim Form must be **submitted online or postmarked by November 25, 2024.** 

# Case 3:18-cv-02354-JD Document 268-3 Filed 10/31/24 Page 10 of 109

Opt-Out or Object: If you opt-out or request exclusion, you will retain your rights to sue Clif Bar separately regarding the issues in the case; however, you will not be eligible to receive any benefits from the Settlement. You must submit a Request for Exclusion, available at the Settlement Website, www.BarsClassAction.com. Request for Exclusions must be postmarked on or before October 22, 2024. Detailed instructions are available on the Settlement Website, www.BarsClassAction.com. You may also object to any part of this Settlement. Details about how to object are available at the Settlement Website, www.BarsClassAction.com. Objections must be mailed to the Class Administrator and postmarked on or before October 22, 2024.

**Do Nothing:** If you do nothing, you will not be eligible to receive any benefits and will be bound by the terms of the Settlement Agreement and Final Judgment.

# Has the Court approved the Settlement?

No. The Court has set a hearing for **November 14, 2024, at 10:00 a.m. California time**, to determine whether to approve the Settlement and what attorneys' fees, expenses, and service payments to award. Class Counsel will file a motion seeking an award of up to one-third of the Settlement Fund in fees, and reimbursement of case expenses totaling up to \$917,584, plus any expenses incurred after entry of the Preliminary Approval Order. Class Counsel will also seek Service Awards of \$5,000 each on behalf of the Class Representatives Ralph Milan and Elizabeth Arnold. The Court will determine the amount of fees, expenses, and service awards that will be paid from the Settlement Fund.

After Class Counsel's motion for attorneys' fees, expenses, and service awards is filed on or before **September 6, 2024**, it will be posted on the Settlement Website, <u>www.BarsClassAction.com</u>, and you will have an opportunity to review and comment on the motion via an objection.

You do not need to appear at the Final Approval Hearing, but you may come at your own expense. The Court has appointed Fitzgerald Monroe Flynn PC (<u>www.fmfpc.com</u>) as Class Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

This is only a summary of the key Settlement terms. A full copy of the Settlement Agreement is available at <u>www.BarsClassAction.com</u>, or by calling 1-844-537-1156.

Please do not contact the Court to inquire about this settlement or the claim process. If you have additional questions, you can visit <u>www.BarsClassAction.com</u> or contact the Settlement Administrator by email at <u>info@barsclassaction.com</u> or by phone at 1-844-537-1156.

Bars Class Action Administrator P.O. Box 671 Baton Rouge, LA 70821 <u>Unsubscribe</u> - <u>Unsubscribe Preferences</u> EAG Gulf Coast, LLC

**Exhibit C: Print Notice** 

se 3:18-cv-02354-JD Document 268-3 Filed 10/31/2 Issue 36 September 2, 2024

WEEKLY

# <section-header>

After Camilla had an affair with his father and broke Princess Diana's heart, has William finally forgiven 'the other woman'?



THOMAS RHETT ON MARRIAGE AND PARENTING 'Giving Up Was Not an Option'



BLAKE & JUSTIN DRAMA What Went Down on Set



Lise 3:18-cv-02354-JD Document 268-3 Filed 10/31/24 Page 13 of 109





# What He Really Thinks of Camilla



# BLAKE & JUSTIN DRAMA What Went Down on Set



THOMAS RHETT

> The refreshingly honest country superstar opens up about the challenges of balancing career with marriage to wife Lauren and raising four kids



# Q: What's it like going "bald" for a role? Itchy? And what if the person has long hair? —Marcy L., Hartford, Conn.

A: Applying a bald cap can take 45 minutes to three hours, says Emmy-nominated makeup artist **Liz Tagg-Wooster** of Iver Makeup Academy at the U.K.'s famed Pinewood Studios, and afterward, a smooth head doesn't mean smooth sailing. During application, "adhesives and solvents can have a noticeable chemical smell," which may or may not fade. Custom-made silicone caps are more breathable than vinyl, but, she adds, "The tight fit necessary for realism can cause discomfort or even headaches if worn for too long." And as with Gremlins, don't get

the cap wet. Or subject it to too much heat.

Longer hair may require two caps, says **Christopher Payne**, Chicago Fire's special effects makeup department head and author of A Beginner's Guide to Special Makeup Effects. Or a tight braid might be poking out of the bald cap in the back, hidden by a high collar or a prop like a bath towel.



Q: Why are there sometimes two or three true-crime documentaries on the same topic? —Lisa H., via email

A: True-crime aficionados know the struggle of choosing between dueling docs. The duplication is often due to timing: Netflix's *Britney* vs *Spears* and FX on Hulu's *Controlling Britney Spears* dropped the same week as her pivotal 2021 conservatorship hearing. Anniversaries, too, spawn multiples, as with the Waco siege (30 years later) and the Jonestown massacre (40 years).

Skye Borgman, director of Netflix's American Murder:



Laci Peterson (also covered in Peacock's Face to Face With Scott Peterson), says perspective matters: Blood spatter or confessions may not change, but "they're not the same stories because they're not the same people behind it."

If you have a burning entertainment question for our team of experts, email us at **AskUs@usmagazine.com** 

# Company ("Clif Bar") made certain statements on the labels of various original Clif Bars and Clif Kid ZBars ("Class Products") that are allegedly misleading because the statements suggested the bars are healthy, whereas Plaintiffs allege the bars are unhealthy because of their added sugar. Clif

Bar maintains that these products are unhealthy because of their added sugar. Chi Bar maintains that these products are not unhealthy due to the presence of added sugars, and that the statements on its bars are true and not misleading. The Court has not determined whether Plaintiffs or Clif Bar is correct.

If You Purchased Certain Clif Bar & Company

Bars Since April 2014 You Could Receive a Cash Payment as Part of a Class Action Settlement.

What is the lawsuit about? The lawsuit contends that Clif Bar &

Who is included? You are a Class Member if you bought one of the Class Products for household use, and not for resale or distribution, between April 2014 and March 2023 in California or New York, or between March 2019 and March 2023 in any other State. The Class Products include Original Clif Bars in packaging stating "Nutrition for Sustained Energy," and Clif Kid ZBars in packaging stating "No High Fructose Corn Syrup;" "Nourishing Kids in Motion;" "In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created Clif Kid – wholesome, delicious snacks made with organic ingredients to help keep kids going, growing, and exploring;" "Blend of carbs, fiber, protein, and fat gives kids energy so they can keep Zipping and Zooming along," and similar Challenged Claims (as identified in the Complaint in the Action).

What does the settlement provide? Clif Bar has agreed to establish a \$12,000,000 "Settlement Fund" to pay all Settlement expenses, including the costs of class notice and administration, attorneys' fees and costs, service awards for the Plaintiffs, and cash refunds for Class Members who make valid Claims. Your legal rights will be affected if you are a Class Member and do not exclude yourself.

### What are your options?

Submit A Claim: To receive Settlement benefits, you must complete and submit a Claim Form. Claim Forms are available at the Settlement Website and can be submitted electronically or mailed to the Class Administrator. A Claim Form must be submitted online or postmarked by November 25, 2024.

**Opt-Out or Object:** If you opt-out or request exclusion, you will retain your rights to sue Clif Bar separately; however, you will not be eligible to receive any benefits. You must submit a Request for Exclusion, available at the Settlement Website. Request for Exclusions must be **postmarked on or before October 22, 2024**. Detailed instructions are available on the Settlement Website. You may also object to any part of this Settlement. Details about how to object are available at the Settlement Website. Objections must be mailed to the Class Administrator and **postmarked on or before October 22, 2024**.

**Do Nothing:** If you do nothing, you will not be eligible to receive any benefits and will be bound by the terms of the Settlement Agreement and Final Judgment.

Has the Court approved the Settlement? No. The Court has set a hearing for November 14, 2024, at 10:00 a.m. California time, to determine whether to approve the Settlement and what attorneys' fees, expenses, and service payments to award. Class Counsel will file a motion seeking an award of up to one-third of the Settlement Fund in fees, and reimbursement of case expenses totaling up to \$917,584.35, plus any expenses incurred after entry of the Preliminary Approval Order. Class Counsel will also seek on behalf of the Class Representatives Service Awards of \$5,000 each for Ralph Milan and Elizabeth Arnold. The Court will determine the amount of fees, expenses, and service awards that will be paid from the Settlement Fund.

After Class Counsel's motion for attorneys' fees, expenses, and service awards is filed on or before **September 9, 2024**, it will be posted on the Settlement Website and you will have an opportunity to review and comment on the motion via an objection.

You do not need to appear at the Final Approval Hearing but you may come at your own expense. The Court has appointed Fitzgerald Monroe Flynn PC as Class Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

This is only a summary of the key Settlement terms. A full copy of the Settlement Agreement is available at the Settlement Website or by calling (844) 537-1156.



1-844-537-1156 www.BarsClassAction.com EAG Gulf Coast, LLC

Exhibit D: Digital Notice



Case 3:18-cv-02354-JD Document 268-3 Filed 10/31/24 Page 16 of 109 Tech Travel

U.S. Olympics Sports Entertainment [ Life ] Money

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Opinion



If you purchased certain Clif Energy Bars outside California and New York since March 2019, you could receive a cash payment as part of a class action settlement.

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# International Cat Day: A day to celebrate your cat

PETS 8:00 a.m. ET Aug. 7



Is yogurt healthy? Health benefits you'll get each spoonful. HEALTH AND WELLNESS 7:48 a.m. ET Aug. 7



Nearly 1 in 4 Americans is deficient in Vitamin D. Are you one of them? HEALTH AND WELLNESS 5:00 a.m. ET Aug. 7

Horoscopes Today, August 7, 2024 HOROSCOPES 4:33 a.m. ET Aug. 7

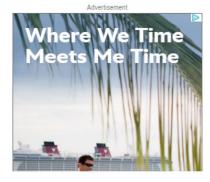
Watch as rare cotton candy lobster caught off New England explores home ANIMALKIND 1:08 p.m. ET Aug. 6

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Here's how to find success dating offline O SELF IMPROVED 12:38 p.m. ET Aug. 6

Extremely rare lobster boasts unique color O ANIMALKIND 10:26 a.m. ET Aug. 6

Simone Biles and an important lesson we learned HEALTH AND WELLNESS 7:13 p.m. ET Aug. 6



### Watch Now



# Health



Halfpoint/iStockphoto/Getty Images

Despite some gains, teens — especially girls — are still struggling with their mental health since the pandemic, report shows



These vision-impaired Olympic stars rely on a 'sixth sense' when they compete



Repeated wildfires put pressure on residents, making it difficult to recover peace of mind



After the end of Roe, a new beginning for maternity homes



Millennials and Gen Xers face higher risk of 17 cancers than previous generations, study suggests



Dr. Sanjay Gupta On Call: What are your questions about staying healthy as kids head back to school?

**Cloning Fast Facts** 

How do teens quit vaping? Some simply send a text for help, new study shows

You need to focus on your pelvic health. A doctor explains why

Monthly abortions continue to trend up in the US in 2024, new report shows

EPA issues emergency ban of weedkiller Dacthal, citing risks to unborn children

How female politicians' first names can work for and against them, according to science

Rugby Olympic medalist Ilona Maher is taking on BMI and winning

Finding the right specialist for depression



If you purchased certain Clif Energy Bars outside California and New York since March 2019, you could receive a cash payment as part of a class action settlement.

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LIFE, BUT BETTER



Simone Biles' winning strategy prioritizes mental health. Here's how to do it



A diet high in fruits and vegetables may reduce your heart and kidney disease risk, study says



Boar's Head recall expanded to include 7 million more pounds of meat products Case 3:18-cv-02354-JD Documer 2:08

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х

# yahoo/life

Why is this shot-putter's hand so big? Is the Seine making athletes sick? Your Olympic health questions answered.



Rebecca Corey · Reporter Updated Wed, August 7, 2024 at 2:18 PM EDT · 13 min read



Athletes dive into the Seine river to compete in the mixed relay on day 10 of the Olympic Games in Paris on Aug. 5. (Aytac Unal/Anadolu via Getty Images)

Olympians need to fuel up and get in the right mindset to perform at peak levels in the hopes of taking home gold. But then there are the X factors like COVID-19, injuries, pregnancies and even dirty water — that can add extra challenges to contend with and, in some cases, make headlines just as much as



If you purchased certain Clif Energy Bars outside California and New York since March 2019, you could receive a cash payment as part of a class action settlement.

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If you purchased certain Clif Energy Bars in California or New York since April 2014, you could receive a cash payment as part of a class action settlement. LEARN MORE



# The most delicious, creative margaritas to try in Los Angeles

The margarita is a revered classic cocktail in Los Angeles, with restaurants and bars featuring creative combinations, classic takes and frozen treats that are perfect for summer.

# **Recipe of the Day**

Birthday Plum Jam



# **Latest Stories**

Curtis Stone to close Maude next month and replace it with Pie Room



What fast-food chain has the best \$5 value meal? Here's our ranking

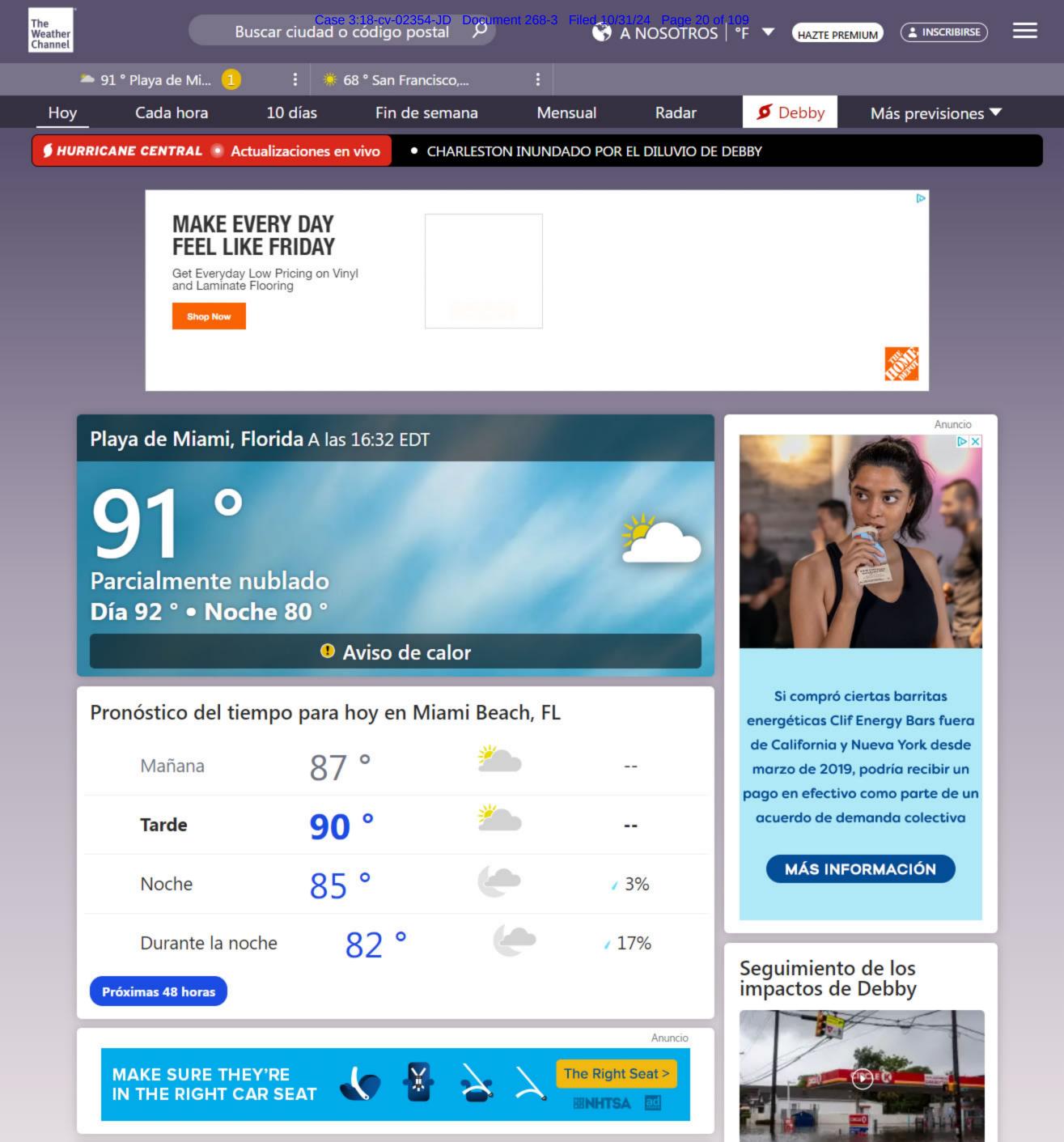


Diep Tran's Buttered Pasta With Dried Shrimp And Sake



The best no-cook ways to use all that tinned fish in your pantry





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ANUNCIO

Si compró ciertas barritas energéticas Clif I Bars en California o Nueva York desde ab 2014, podría recibir un pago en efectivo c parte de un acuerdo de demanda colect

MÁS INFORMACIÓN

# **Titulares de Hoy**



¿Listo para que comience la escuela? Cómo se prepara una maestra de primaria de Modesto para el primer día



Una mujer de Laguna Beach que le dijo a los bañistas 'iSalgan de aquí!' es blanco de la **Comisión Costera** 



Kamala Harris presenta a su compañero de fórmula, Tim Walz, como 'el vicepresidente que **EEUU merece'** 



EEUU pide a Maduro a que reconozca 'los verdaderos resultados' de elecciones en Venezuela



# **Notas Recientes**

Alemania, Brasil y Canadá fuera; la Copa Mundial femenina comienza a ser más equitativa Ago. 4, 2023

**EEUU** suspende permisos humanitarios de entrada a ciudadanos de 4 países por preocupaciones de fraude

Ago. 4, 2024

El gobernador Newsom está hablando de prohibir los teléfonos móviles en las escuelas. ¿Cuál es la política en Modesto?

Ago. 4, 2024

tormentas eléctricas Ago. 4, 2024

Una terapia génica experimental permite que niños con sordera hereditaria oigan

Ago. 3, 2024







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Bomberos luchan contra enorme incendio forestal en California antes de Noticias Clima

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VC122384

TRABAJANDO PARA TI

8-3 Filed 10/31/24 Page 22 of 109

COMUNIDAD



ANUNCIAR

# Las enfermeras del Hospital Infantil Rady rechazan la última oferta de contrato

Unas 1.600 enfermeras del Hospital Infantil Rady rechazaron la última oferta de contrato del centro médico de San Diego.



**Carteristas captados** en video atacando a personas en el centro de San Diego



Aquí se muestra la cantidad de pies cuadrados que puede obtener por \$1500...

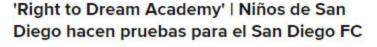
Harris presenta a su nuevo compañero de fórmula, el gobernador de Minnesota Tim Walz, como el "vicepresidente que Estados Unidos merece"

**75 ANIVERSARIO** 

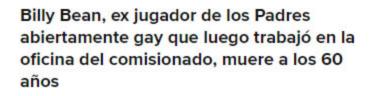
El Instituto Scripps de Oceanografía de la UC San Diego recibe a estudiantes de secundaria de Bridge Builders Foundation



MAÑANAS



Regreso a clases 2024 | Médico comparte consejos para ayudar a los estudiantes con su salud mental



Un terremoto de magnitud 5,2 sacude el sur de California cerca de Bakersfield

National Night Out conecta a las fuerzas del orden de San Diego con miembros de la comunidad



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# Presentado



Campaña de recolección de alimentos de verano | Ayude a



Conozca a los pandas gigantes del Zoológico de San Diego el



Desfile del Orgullo Gay de San

Diego 2024 | Ver la repetición



AHORA MISMO San Diego, California »

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# CUATRO

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Si compró ciertas barritas energéticas Clif Energy Bars en California o Nueva York desde abril de 2014, podría recibir un pago en efectivo como parte de un acuerdo de demanda colectiva.

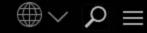
MÁS INFORMACIÓN



 $\mathbb{D} \times$ Si compró ciertas barritas energéticas Clif Energy Bors fuera de California y Nueva York desde marzo de 2019, podria recibir un pago en efectivo como parte de un acuerdo de demanda colectiva.

MÁS INFORMACIÓN

EE.UU. Mundo México Colombia Argentina Latam Negocios Clima Entretenimiento Video Deportes Salud CINN



TEMAS DEL DÍA Elecciones en Venezuela Juegos Olímpicos Tim Walz Dirigente venezolana graba su detención Medallero olímpico Imane Khelif





# Argentina reconoce a González Urrutia como el ganador de las elecciones

La cancillería argentina publicó un comunicado en el que afirma que "el pueblo venezolano se expresó mayoritariamente" en favor de la candidatura de González Urrutia, y que "la voluntad popular debe ser respetada".

- El TSJ comienza peritaje de actas de la elección presidencial
- Entre los detenidos figuran personas con discapacidad
- Trump dice que Venezuela está gobernado por un dictador



# VENEZUELA

Denuncian detención de líder estatal de la oposición venezolana



# POLÍTICA

Así han sido las políticas progresistas de Tim Walz en Minnesota

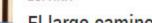


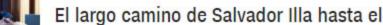
# UCRANIA

Rusia dice que tropas ucranianas cruzaron a su territorio y lanzaron ataque



# **ESPAÑA**







TURISMO

Este sería el primer aeropuerto del mundo que no pedirá pasaporte físico



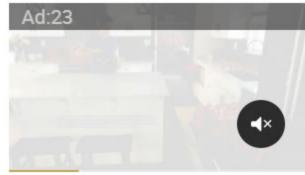
# **CIENCIA Y ESPACIO**

Los astronautas del Starliner de Boeing llevan más de 60 días en el espacio



# MINUTO A MINUTO

La ecuatoriana Lucía Yépez peleará por la medalla de oro en lucha libre



Ciencia y Espacio La Agencia Especial Europea busca voluntarios para clasificar...

### EUROPA

1 hora

2 detenidos por presuntos planes de atentar shows de Taylor Swif en Viena

# ANÁLISIS

2 horas

¿Qué es el "carry trade" y cómo afectó a la caída global de los mercados?

# MÉXICO

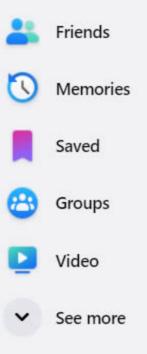
2 horas

Niegan nuevo juicio para Genaro García Luna en EE.UU.











Clif Bars Class Action Settlement Sponsored

If you purchased certain Clif Energy Bars in California or New York since April 2014, you could receive a cash payment as part of a class action settlement.



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BARSCLASSACTION.COM Acuerdo de Demanda Colectiva

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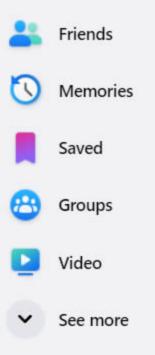


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Clif Bars Class Action Settlement 

colectiva.

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Acuerdo de Demanda Colectiva

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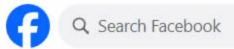


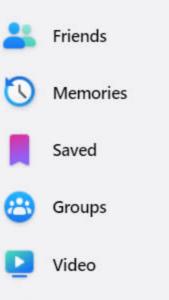
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If you purchased certain Clif Energy Bars outside California and New York since March 2019, you could receive a cash payment as part of a class action settlement.



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# Purchases include certain Clif Energy Bars and Clif Kid ZBars made in California and New York from April 19, 2014 to March 31, 2023 and outside California and New York from March 31, 2019 to March 31, 2023 are eligible.





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# www.BarsClassAction.com

# to submit a claim or find more information.





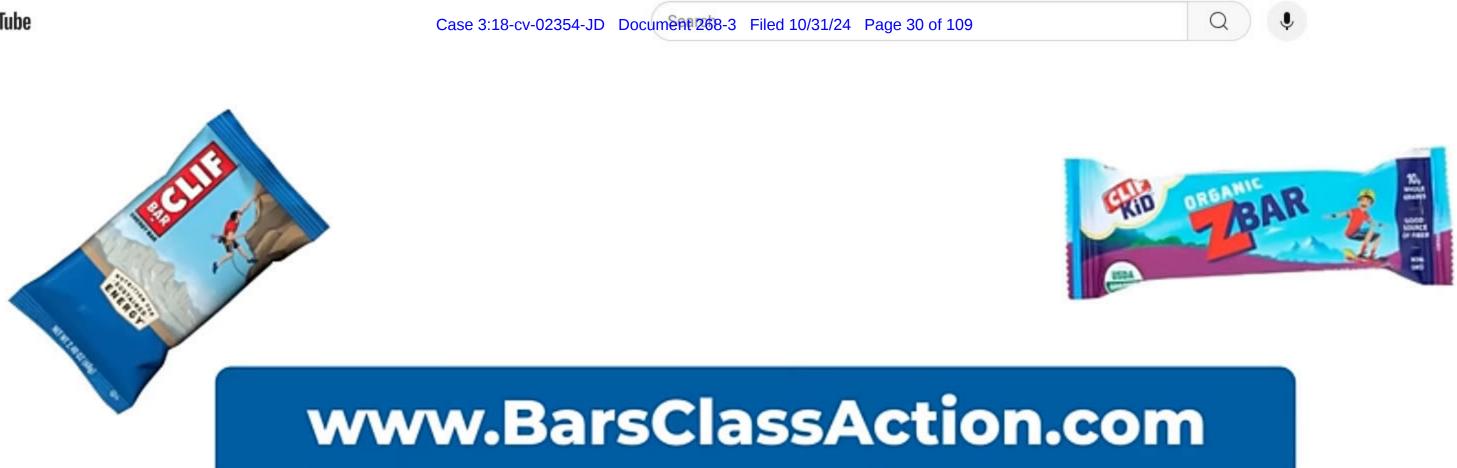
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# The deadline to submit a claim is November 25, 2024.





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# v-02354-JD Docum**ent 26803** Filed 10/31/24 Pa



Clif Bars Class Action Se... Sponsored



### Learn more



If you purchased certain Clif Energy Bars in California or New York since April 2014, you could receive a cash payment as part of a class action settlement.

 $\square$ 

# v-02354-JD Docum**ent 26803** Filed 10/31/24 Pa



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### Learn more



If you purchased certain Clif Energy Bars outside California and New York since March 2019, you could receive a cash payment as part of a class action settlement.

 $\square$ 

# v-02354-JD Document 268-3, Filed 10/31/24 Pa



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### Learn more

# $\bigcirc \bigcirc \land \blacksquare$

Si compró ciertas barritas energéticas Clif Energy Bars en California o Nueva York desde abril de 2014, podría recibir un pago en efectivo como parte de un acuerdo de demanda colectiva.

 $\square$ 

EAG Gulf Coast, LLC

Exhibit E: Streaming TV

### 30-second Video Script

Have you purchased certain Clif Energy Bars?

(on screen) Purchases include certain Clif Energy Bars and Clif Kid Zbars.

If you purchased in California or New York between April 2014 and March 2023, or between March 2019 and March 2023 in any other State, you may be eligible to receive a cash payment from a class action settlement.

(on screen) Purchases include certain Clif Energy Bars and Clif Kid ZBars made in California and New York from April 19, 2014 to March 31, 2023 and outside California and New York from March 31, 2019 to March 31, 2023 are eligible.

The lawsuit alleges Clif Bar labeled these products with certain health claims which were misleading in light of the sugar content. Clif Bar denies the allegations of the complaint and has settled this case to avoid further distraction and the cost of litigation.

Visit <u>BarsClassAction.com</u> for more information.

(on screen) <u>www.BarsClassAction.com</u> to submit a claim or find more information.

The deadline to submit a claim is November 25, 2024.

(on screen) www.BarsClassAction.com to submit a claim or find more information.

(on screen) The deadline to submit a claim is November 25, 2024.

### 15-second Video Script

If you purchased certain Clif Energy Bars in California or New York between April 2014 and March 2023, or between March 2019 and March 2023 in any other State, you may be eligible to receive a cash payment from a class action settlement.

(on screen) Purchases include certain Clif Energy Bars and Clif Kid ZBar made in California and New York from April 19, 2014 to March 31, 2023 and outside California and New York from March 31, 2019 to March 31, 2023 are eligible.

(on screen) <u>www.BarsClassAction.com</u> to submit a claim or find more information.

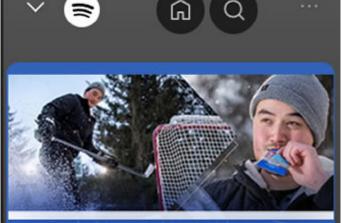
Visit <u>BarsClassAction.com</u> for more information.

(on screen) www.BarsClassAction.com to submit a claim or find more information.

(on screen) The deadline to file a claim is November 25, 2024.

EAG Gulf Coast, LLC

Exhibit F: Streaming Radio



If you purchased certain Clif Energy Bars in California or New York since April 2014, you could receive a cash payment as part of a class action settlement.

#### LEARN MORE

Advertisement

0:00 -0:15 √ K ► M △ Class Action

Settlement

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If you purchased certain Clif Energy Bars outside California and New York since March 2019, you could receive a cash payment as part of a class action settlement.

### LEARN MORE

EAG Gulf Coast, LLC

Exhibit G: Search Advertising



#### All News Images Shopping Videos Forums Maps : More

Case 3:18-cv-02354-JD Document 268-3 Filed 10/31/24 Page 40 of 109

Tools

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S barsclassaction.com https://www.barsclassaction.com

#### Purchased Clif Bars? | You May Be Entitled to Payment

If you bought certain **Clif Bars**, you might be eligible for a cash payment. Visit the **Settlement** Website to learn more and to submit your claim before the deadline.

#### Top stories :

#### Green Matters

What You Need to Know About Clif Bar's Massive Class Action Lawsuit Settlement

4 hours ago



Bought Clif Bars? You could be owed part of \$12 million settlement. What to know



#### PRN PR Newswire

9 hours ago

If You Purchased Certain Clif Bar & Company Bars Since April 2014 You Could Receive a Cash Payment as Part of a Class Action Settlement

2 days ago

More news →

The US Sun https://www.the-sun.com > Money > News Money

#### Clif Bar is handing out one-time payments from \$12 million ...

2 days ago - Clif Bar & Company, an American company that makes energy foods and drinks, is being sued over alleged labeling issues with its products.

goSkagit https://www.goskagit.com > if-you-purchased-certain-cl...

#### If You Purchased Certain Clif Bar & Company Bars Since ...

2 days ago - The **lawsuit** contends that **Clif Bar** & Company ("**Clif Bar**") made certain statements on the labels of various original **Clif Bars** and Clif Kid ZBars



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barsclassaction.com

https://www.barsclassaction.com

#### Clif Bars Class Action | You May Be Eligible for Cash

Purchased certain **Clif Bars**? You could get a cash payment. Check eligibility now! Visit the Settlement Website to submit your claim or...

Clif Bar https://www.clifbar.com

#### Clif Bar: Homepage

From CLIF to LUNA to CLIF KID, we make nutritious energy foods for every moment in your day and everybody in your family.

#### **CLIF BAR® Flavors**

CLIF BAR · CLIF BAR® Bulk Variety Pack, 36 Bars ....

#### Careers

Want to join our team? Clif Bar believes happy, healthy people ...

#### Shop

BLOKS Energy Chews · Sour Green Apple Flavor · Sour ...

#### Energy Bars CLIF BAR® Energy Bar is made with nutritious, sustainable ...

#### Who We Are

About Clif Bar: with people, passion and healthy food at the ...

#### More results from clifbar.com »

Wikipedia https://en.wikipedia.org > wiki > Clif\_Bar

#### Clif Bar

W



**Clif Bar** & Company is an American company that produces energy foods and drinks. The company's flagship product, **CLIF Bar**, was created by Gary Erickson and ... EAG Gulf Coast, LLC

**Exhibit H: Press Release** 

# If You Purchased Certain Clif Bar & Company Bars Since April 2014 You Could Receive a Cash Payment as Part of a Class Action Settlement USA-English •

NEWS PROVIDED BY Bars Class Action Administrator → Aug 05, 2024, 11:00 ET

SAN FRANCISCO, Aug. 5, 2024 /PRNewswire/ -- The following notice is being issued by the Courtapproved Class Administrator and has been authorized by the U.S. District Court for the Northern District of California, in *Milan v. Clif Bar & Co.*, No. 18-cv-2354-JD.

What is the lawsuit about? The lawsuit contends that Clif Bar & Company ("Clif Bar") made certain statements on the labels of various original Clif Bars and Clif Kid ZBars ("Class Products") that are allegedly misleading because the statements suggested the bars are healthy, whereas Plaintiffs allege the bars are unhealthy because of their added sugar. Clif Bar maintains that these products are not unhealthy due to the presence of added sugars, and that the statements on its bars are true and not misleading. The Court has not determined whether Plaintiffs or Clif Bar is correct.

**Who is included?** You are a Class Member if you bought one of the Class Products for household use, and not for resale or distribution, between April 2014 and March 2023 in California or New York, or between March 2019 and March 2023 in any other State. The Class Products include Original Clif Bars in packaging stating "Nutrition for Sustained Energy," and Clif Kid ZBars in packaging stating "No High Fructose Corn Syrup;" "Nourishing Kids in Motion;" "In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created Clif Kid – wholesome, delicious snacks made

with organic ingredients to help keep kids going, growing, and exploring;" "Blend of carbs, fiber, Case 3:18-cv-02354-JD Document 268-3 Filed 10/31/24 Page 44 of 109 protein, and fat gives kids energy so they can keep Zipping and Zooming along," and similar Challenged Claims (as identified in the Complaint in the Action).

What does the settlement provide? Clif Bar has agreed to establish a \$12,000,000 "Settlement Fund" to pay all Settlement expenses, including the costs of class notice and administration, attorneys' fees and costs, service awards for the Plaintiffs, and cash refunds for Class Members who make valid Claims. Your legal rights will be affected if you are a Class Member and do not exclude yourself.

#### What are your options?

**Submit A Claim:** To receive Settlement benefits, you must complete and submit a Claim Form. Claim Forms are available at the Settlement Website, <u>wwwBarsClassAction.com</u>, and can be submitted electronically or mailed to the Class Administrator. A Claim Form must be **submitted online or postmarked by November 25, 2024.** 

**Opt-Out or Object:** If you opt-out or request exclusion, you will retain your rights to sue Clif Bar separately; however, you will not be eligible to receive any benefits. You must submit a Request for Exclusion, available at the Settlement Website, <u>www.BarsClassAction.com</u>. Request for Exclusions must be **postmarked on or before October 22, 2024**. Detailed instructions are available on the <u>Settlement Website</u>. You may also object to any part of this Settlement. Details about how to object are available at the <u>Settlement Website</u>. Objections must be mailed to the Class Administrator and **postmarked on or before October 22, 2024**.

**Do Nothing:** If you do nothing, you will not be eligible to receive any benefits and will be bound by the terms of the Settlement Agreement and Final Judgment.

Has the Court approved the Settlement? No. The Court has set a hearing for November 14, 2024, at 10:00 a.m. California time, to determine whether to approve the Settlement and what attorneys' fees, expenses, and service payments to award. Class Counsel will file a motion seeking an award of up to one-third of the Settlement Fund in fees, and reimbursement of case expenses totaling up to \$917,584.35, plus any expenses incurred after entry of the Preliminary Approval Order. Class Counsel will also seek on behalf of the Class Representatives Service Awards of \$5,000 each for Ralph Milan and Elizabeth Arnold. The Court will determine the amount of fees, expenses, and service awards that will be paid from the Settlement Fund.

After Class Counsel's motion for attorneys' fees, expenses, and service awards is filed on or before Case 3:18-cv-02354-JD Document 268-3 Filed 10/31/24 Page 45 of 109 September 9, 2024, it will be posted on the <u>Settlement Website</u> and you will have an opportunity to review and comment on the motion via an objection.

You do not need to appear at the Final Approval Hearing but you may come at your own expense. The Court has appointed Fitzgerald Monroe Flynn PC as Class Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

This is only a summary of the key Settlement terms. A full copy of the Settlement Agreement is available at the **Settlement Website**.

SOURCE Bars Class Action Administrator

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# Si compró ciertas barritas de Clif Bar & Company desde abril de 2014, podría recibir un pago en efectivo como parte de un Acuerdo de Demanda Colectiva. USA-español •

NEWS PROVIDED BY Bars Class Action Administrator → Aug 05, 2024, 11:00 ET

SAN FRANCISCO, 5 de agosto de 2024 /PRNewswire-HISPANIC PR WIRE/ -- El siguiente aviso es emitido por el Administrador del Colectivo aprobado por el Tribunal y ha sido autorizado por el Tribunal de Distrito de los Estados Unidos para el Distrito Norte de California, en el caso *Milan v. Clif Bar & Co.*, Nro. 18-cv-2354-JD.

¿De qué se trata esta demanda? La demanda sostiene que Clif Bar & Company ("Clif Bar") realizó ciertas afirmaciones en las etiquetas de varias barras Clif originales y Clif Kid ZBars ("Productos de la Demanda Colectiva") que supuestamente son engañosas porque las afirmaciones sugerían que las barras son saludables, mientras que los Demandantes alegan que las barras no son saludables debido a su azúcar agregado. Clif Bar sostiene que estos productos no son poco saludables debido a la presencia de azúcares agregados, y que las afirmaciones que figuran en sus barritas son ciertas y no engañosas. El Tribunal no ha resuelto si los Demandantes o Clif Bar tienen razón.

¿Quiénes están incluidos? Usted es Miembro del Colectivo de Demandantes si compró alguno de los Case 3:18-cv-02354-JD Document 268-3 Filed 10/31/24 Page 47 of 109 Productos de la Demanda Colectiva para uso doméstico, y no para reventa o distribución, entre abril de 2014 y marzo de 2023 en California o Nueva York, o entre marzo de 2019 y marzo de 2023 en cualquier otro estado. Los Productos de la Demanda Colectiva incluyen barritas Clif Bars Originales en cuyo envase diga "Nutrition for Sustained Energy" ("Nutrición para una energía sostenida") y barritas Clif Kid ZBars en cuyo envase diga "No High Fructose Corn Syrup ("Sin jarabe de maíz con alto contenido de fructosa"); "Nourishing Kids in Motion" ("Nutriendo a los niños en movimiento"); "In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created Clif Kid – wholesome, delicious snacks made with organic ingredients to help keep kids going, growing, and exploring" ("Durante la crianza de nuestra familia, no fue fácil encontrar tentempiés nutritivos para nuestros hijos. Por eso creamos Clif Kid, unos tentempiés sanos y deliciosos elaborados con ingredientes orgánicos para ayudar a los niños a mantenerse en movimiento, crecer y explorar"); "Blend of carbs, fiber, protein, and fat gives kids energy so they can keep Zipping and Zooming along" ("La mezcla de carbohidratos, fibra, proteínas y grasas aporta energía a los niños para que puedan seguir haciendo zipping y zooming"), y Afirmaciones Impugnadas similares (que se identifican en la Demanda de la Acción).

¿Qué ofrece el acuerdo? Clif Bar ha acordado establecer un "Fondo del Acuerdo" de \$12.000.000 para pagar todos los gastos del Acuerdo de conciliación, incluidos los costos de notificación y administración del colectivo, honorarios de abogados y costas judiciales, pagos en concepto de retribución por servicios para los Demandantes y pagos en efectivo para los Miembros del Colectivo de Demandantes que presenten Reclamos válidos. Sus derechos legales se verán afectados si es Miembro del Colectivo de Demandantes y no se excluye.

#### ¿Cuáles son sus opciones?

Presentar un Reclamo: Para recibir beneficios del Acuerdo, debe completar y presentar un Formulario de Reclamo. Los Formularios de Reclamo están disponibles en el Sitio Web del Acuerdo, <u>www.BarsClassAction.com</u>, y pueden presentarse por vía electrónica o enviarse por correo postal al Administrador del Colectivo. El Formulario de Reclamo deberá **presentarse en línea o llevar el sello postal fechado a más tardar el 25 de noviembre de 2024.** 

**Excluirse voluntariamente u oponer objeciones:** Si se excluye voluntariamente o solicita su exclusión, conservará sus derechos a demandar a Clif Bar por separado; sin embargo, no podrá recibir ningún beneficio. Debe enviar una Solicitud de Exclusión, disponible en el Sitio Web del Acuerdo,

www.BarsClassAction.com. La Solicitud de Exclusión debe llevar el sello postal fechado a más tardar Case 3:18-cv-02354-JD Document 268-3 Filed 10/31/24 Page 48 of 109 el 22 de octubre de 2024. En el <u>Sitio Web del Acuerdo</u>, encontrará instrucciones detalladas. También puede objetar alguna parte del presente Acuerdo. En el <u>Sitio Web del Acuerdo</u>, podrá consultar detalles sobre cómo oponer objeciones. Las objeciones deben enviarse por correo al Administrador del Colectivo y llevar el sello postal fechado a más tardar el 22 de octubre de 2024.

**No hacer nada:** Si no hace nada, no tendrá derecho a recibir ningún beneficio y quedará obligado por los términos del Acuerdo de Conciliación y la Sentencia Definitiva.

**¿El Tribunal ha aprobado el Acuerdo?** No. El Tribunal ha fijado una audiencia para el **14 de noviembre de 2024, a las 10:00 a. m., hora de California**, para decidir si aprueba el Acuerdo y fijar los honorarios de abogados, gastos y pagos en concepto de retribución por servicios que otorgará. Los Abogados del Colectivo de Demandantes presentarán un escrito solicitando el pago de hasta un tercio del Fondo del Acuerdo en concepto de honorarios, y el reembolso de los gastos del proceso por un total de hasta \$917.584,35, más los gastos incurridos con posterioridad al dictado de la Orden de Aprobación Preliminar. Los Abogados del Colectivo de Demandantes también solicitarán, en nombre de los Representantes del Colectivo, pagos en concepto de Retribución por Servicios a favor de Ralph Milan y Elizabeth Arnold por \$5.000 a cada uno. El Tribunal determinará el monto de los honorarios, los gastos y los pagos en concepto de retribución por servicios prestados que se pagarán con cargo al Fondo del Acuerdo.

Una vez que se presente la solicitud de los Abogados del Colectivo de Demandantes relativa a los honorarios de abogados, gastos y pagos en concepto de retribución por servicios a más tardar el **9 de septiembre de 2024**, se publicará en el **Sitio Web del Acuerdo** y usted tendrá la oportunidad de revisar y comentar la solicitud mediante una objeción.

No es necesario que comparezca a la Audiencia de Aprobación Definitiva, pero puede asistir a su costo. El Tribunal ha nombrado a Fitzgerald Monroe Flynn PC como Abogados del Colectivo de Demandantes. Si usted quiere que lo represente su propio abogado, deberá contratarlo a su propio costo.

Este es solo un resumen de los términos clave del Acuerdo. Puede obtener una copia completa del Acuerdo de Conciliación en el **Sitio Web del Acuerdo** o llamando al (844) 537-1156.

FUENTE Bars Class Action Administrator

If You Purchased Certain Clif Bar & Company Bars Since April 2014 You Could Receive a Cash Payment as

#### Part of a Class Action Settlement

Composite	View Release
(English) PR Newswire ID: 4225846-1 Clear Time Aug 05, 2024 11:00 A	
Report shows data for: All 2 releases	
Pickup	
119M	588
TOTAL POTENTIAL AUDIENCE	TOTAL EXACT MATCHES
TOP EXACT MATCH PICKUP	
BENZINGA Benzinga	
BENZINGA 8M visitors/month <sup>[1]</sup>	
KTLA [Los Ang 7.1M visitors/month <sup>[1]</sup>	
PR Newswire	
PR Newswire 5.6M visitors/month <sup>[1]</sup>	
Nawe O WFLA [Tampa, FL]	
5M visitors/month <sup>[1]</sup>	
4.5M visitors/month <sup>[1]</sup>	
Seeking Alpha 4.4M visitors/month [1]	
FOX8         WJW-TV FOX-8           4.1M visitors/month <sup>[1]</sup>	
EOV EO WXIN-TV FOX-5	
<b>FOX 59</b> WXIN-TV FOX-5 3.2M visitors/month <sup>[1]</sup>	
<b>EXAM-TV NBC-3</b> 2.8M visitors/month <sup>[1]</sup>	
KPLFT FOX-2 2.4M visitors/month <sup>[1]</sup>	
CHICAGO'S VERY OWN 2.2M visitors/month <sup>[1]</sup>	
FOX31 2(WAW)S 2.1M visitors/month <sup>[1]</sup>	
2.1M visitors/month <sup>[1]</sup>	
WKRN [Nashvil	
2M visitors/month <sup>[1]</sup>	
<b>FOX5</b> KSWB [San Die 1.8M visitors/month <sup>[1]</sup>	
KRON [San Fra	
1.8M visitors/month <sup>[1]</sup>	

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\*DATA SOURCES: [1] Similarweb [2] ALEXA, [3] SITEWORTHTRAFFIC.COM [4] CISION DIGITAL REACH

\*THE DATA CITED HERE BY SIMILARWEB REPRESENTS SITE TRAFFIC DATA OF WORLDWIDE UNIQUE VISITORS ON DESKTOP AND MOBILE DEVICES. DATA IS UPDATED MONTHLY.

Views & Engagement

Views & Engagement data will continue to mature over time. Totals below are expected to have reached 98% maturity when the circles below are darker in color.

7,490 CLICK-THROUGHS

1 SHARES



Distribution

914 TOTAL AP OUTLETS DISTRIBUTED

TOP AP OUTLETS

CISION INFLUENCER LISTS

C-SPAN 86.2M Visitors/Month Washington, DC

Scribd, Inc. 43.5M Visitors/Month San Francisco, CA

FoxNews.com 32.5M Visitors/Month New York, NY

**CBS News Radio** 30M Visitors/Month New York, NY

New York Time... 29.9M Visitors/Month New York, NY

Apple Inc. 29.7M Visitors/Month Cupertino, CA

**CNBC.com** 26.1M Visitors/Month Englewood Cliffs, NJ

CBSnews.com 26.1M Visitors/Month New York, NY **1.3K** TOTAL INFLUENCERS DISTRIBUTED

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List Name	Outlet	Recipients
Food (English)	Remezcla	4
Food (English)	LATINA Style	3
Food (English)	NBC News Latino	3
Food (English)	PlanetM	3
Food (English)	El Vistazo	2
Food (English)	Fusion	2

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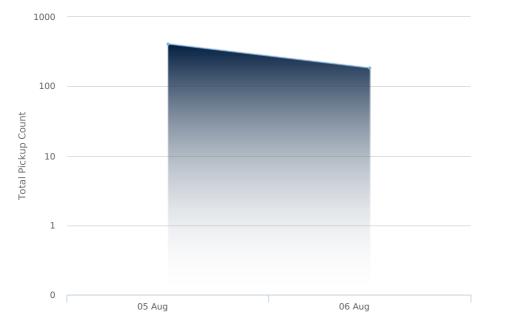
### Pickup

### Overview

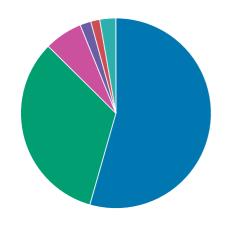
TOTAL PICKUP		588	TOTAL POTENTIAL	TOTAL POTENTIAL AUDIENCE	
Exact Match	588 postings		Exact Match	119M visitors	

### Total Pickup Over Time

#### Total pickup since your content was distributed

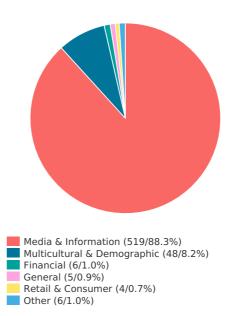


Total Pickup by Source Type



Newspaper (320/54.4%)
 Broadcast Media (194/33.0%)
 Online News Sites & Other Influencers (38/6.5%
 Blog (11/1.9%)
 Print Media (9/1.5%)
 Other (16/2.7%)

Total Pickup by Industry



### Exact Match Pickup

Exact matches are full text postings of your content which we have found in the online and social media that we monitor. Understand how it is calculated.

#### Total Exact Matches: 588

Total Potential Audience: 119,022,286

Logo	Outlet Name	Location	Source Type	Industry	Potential Audience
BENZINGA	Benzinga Online 🖵 View Release	United States	Online News Sites & Other Influencers	Financial	7,968,427 <sup>[1]</sup> visitors/month
	KTLA [Los Angeles, CA] Online 🖵 View Release	United States	Broadcast Media	Media & Information	7,073,654 <sup>[1]</sup> visitors/month
PR Newswire	PR Newswire Online 🖵 View Release	Global	PR Newswire	Media & Information	5,590,155 <sup>[1]</sup> visitors/month
PR Newswire	PR Newswire Online - View Release	Global	PR Newswire	Media & Information	5,590,155 <sup>[1]</sup> visitors/month
	WFLA [Tampa, FL] Online 🖵 View Release	United States	Broadcast Media	Media & Information	4,950,418 <sup>[1]</sup> visitors/month
M RNINGSTAR"	Morningstar Online 🖵 View Release	Global	Financial Data, Research & Analytics	Financial	4,486,842 <sup>[1]</sup> visitors/month
Seeking Alpha <sup>(),</sup>	Seeking Alpha Online 🖵 View Release	United States	Online News Sites & Other Influencers	Financial	4,371,062 <sup>[1]</sup> visitors/month
FOX 8	WJW-TV FOX-8 [Cleveland, OH] Online	United States	Broadcast Media	Media & Information	4,127,594 <sup>[1]</sup> visitors/month
FOX 59	WXIN-TV FOX-59 [Indianapolis, IN] Online	United States	Broadcast Media	Media & Information	3,161,353 <sup>[1]</sup> visitors/month
<b>kxan</b> <sub>e</sub>	KXAN-TV NBC-36 [Austin, TX] Online 🖵 View Release	United States	Broadcast Media	Media & Information	2,755,722 <sup>[1]</sup> visitors/month
	KTVI-TV FOX-2 [St. Louis, MO] Online TView Release	United States	Broadcast Media	Media & Information	2,367,016 <sup>[1]</sup> visitors/month
CHICAGO'S VERY OWN	WGN [Chicago, IL] Online 🖵 View Release	United States	Broadcast Media	Media & Information	2,152,454 <sup>[1]</sup> visitors/month
FOX 31 2 COLORADO'S	KDVR [Denver, CO] Online I View Release	United States	Broadcast Media	Media & Information	2,091,917 <sup>[1]</sup> visitors/month
WKRN COM	WKRN [Nashville, TN] Online 🖵 View Release	United States	Broadcast Media	Media & Information	2,003,550 <sup>[1]</sup> visitors/month
FOX 5	KSWB [San Diego, CA] Online 🖵 View Release	United States	Broadcast Media	Media & Information	1,837,749 <sup>[1]</sup> visitors/month
KRON	KRON [San Francisco, CA] Online 🖵 View Release	United States	Broadcast Media	Media & Information	1,774,145 <sup>[1]</sup> visitors/month

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	KLAS-TV CBS-8 [Las Vegas, NV] Online 🖵 View Release	United States	Broadcast Media	Media & Information	1,730,714 <sup>[1]</sup> visitors/month
FOX 8	WGHP [Greensboro, NC] Online 🖵 View Release	United States	Broadcast Media	Media & Information	1,653,457 <sup>[1]</sup> visitors/month
	WPIX-TV CW-11 [New York, NY] Online  Uiew Release	United States	Broadcast Media	Media & Information	1,648,704 <sup>[1]</sup> visitors/month
	WHTM [Harrisburg, PA] Online  View Release	United States	Broadcast Media	Media & Information	1,645,761 <sup>[1]</sup> visitors/month
MAVY.com	WAVY-TV NBC-10 [Portsmouth, VA] Online  View Release	United States	Broadcast Media	Media & Information	1,625,198 <sup>[1]</sup> visitors/month
Сом	KTVX [Salt Lake City, UT] Online 🖵 View Release	United States	Broadcast Media	Media & Information	1,438,932 <sup>[1]</sup> visitors/month
FOX4	WDAF [Kansas City, MO] Online 🖵 View Release	United States	Broadcast Media	Media & Information	1,417,348 <sup>[1]</sup> visitors/month
	WCMH [Columbus, OH] Online  View Release	United States	Broadcast Media	Media & Information	1,404,208 <sup>[1]</sup> visitors/month
<b>BINEWS</b>	WRIC [Richmond, VA] Online  View Release	United States	Broadcast Media	Media & Information	1,290,843 <sup>[1]</sup> visitors/month
WATCHING OUT FOR YOU	KOIN-TV CBS-6 [Portland, OR] Online  Uiew Release	United States	Broadcast Media	Media & Information	1,243,184 <sup>[1]</sup> visitors/month
CBS17.COM	WNCN [Raleigh, NC] Online  Uiew Release	United States	Broadcast Media	Media & Information	1,148,400 <sup>[1]</sup> visitors/month
WOOD WOODTV.COM	WOOD [Grand Rapids, MI] Online 🖵 View Release	United States	Broadcast Media	Media & Information	1,147,492 <sup>[1]</sup> visitors/month
	KFOR [Oklahoma City, OK] Online 🖵 View Release	United States	Broadcast Media	Media & Information	1,135,961 <sup>[1]</sup> visitors/month
FOX 40	KTXL [Sacramento, CA] Online 🖵 View Release	United States	Broadcast Media	Media & Information	1,089,889 <sup>[1]</sup> visitors/month
The Gazette, Colorado Springs, Colorado	The Gazette, Colorado Springs, Colorado Online 🖵 View Release	United States	Newspaper	Media & Information	1,079,539 <sup>[1]</sup> visitors/month
KRQE REPORTING YOU CAN TRUST	KRQE [Albuquerque, NM] Online 🖵 View Release	United States	Broadcast Media	Media & Information	968,199 <sup>[1]</sup> visitors/month
NEWS8 wtnh.com	WTNH [New Haven, CT] Online - View Release	United States	Broadcast Media	Media & Information	958,827 <sup>[1]</sup> visitors/month
WKBN 27.	WKBN-TV CBS-27 [Youngstown, OH] Online Uiew Release	United States	Broadcast Media	Media & Information	917,545 <sup>[1]</sup> visitors/month
6 WATE.com	WATE [Knoxville, TN] Online  View Release	United States	Broadcast Media	Media & Information	906,136 <sup>[1]</sup> visitors/month

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Image: Second system       Oral         Image: Second system       Image: Second system         Image: Second system	WLP-TV NBC-22 [Springfield, MA] Inline View Release VREG [Memphis, TN] Inline View Release VPRI/WNAC [Providence, RI] Inline View Release Inline View Release	United States United States United States	Broadcast Media Broadcast Media	Media & Information Media & Information	895,235 <sup>[1]</sup> visitors/month 850,584 <sup>[1]</sup> visitors/month
Image: Constraint of the second se	VPRI/WNAC [Providence, RI]	States United		Media & Information	
Arizona Daily Star [Tucson, Az]       Ar Or         KHQ-TV, Spokane, Washington       KH Or         Image: Construction of the system       Weight of the system         Image: Construction of the system       Weight of the system         Image: Construction of the system       Weight of the system         Image: Construction of the system       Weight of the system         Image: Construction of the system       Weight of the system         Image: Construction of the system       Weight of the system         Image: Construction of the system       Weight of the system         Image: Construction of the system       Weight of the system         Image: Construction of the system       Weight of the system         Image: Construction of the system       Weight of the system         Image: Construction of the system       Weight of the system         Image: Construction of the system       Weight of the system         Image: Construction of the system       Weight of the system         Image: Construction of the system       Weight of the system         Image: Construction of the system       Weight of the system         Image: Construction of the system       Weight of the system         Image: Construction of the system       Weight of the system         Image: Construction of the system       Weig	nline		Broadcast Media		
Star [Tucson, Az]     Or       KHQ-TV, Spokane, Washington     KHQ-TV, Construction	rizona Daily Star (Tucson A7)			Media & Information	787,926 <sup>[1]</sup> visitors/month
Spokane, Or Washington Or Or Or Or Or	nline	United States	Newspaper	Media & Information	785,972 <sup>[1]</sup> visitors/month
ON WARD CON	HQ-TV, Spokane, Washington	United States	Newspaper	Media & Information	718,641 <sup>[1]</sup> visitors/month
KI	VDTN/WBDT [Dayton, OH] Inline 및 View Release	United States	Broadcast Media	Media & Information	711,490 <sup>[1]</sup> visitors/month
	HON [Honolulu, HI] Inline 🖵 View Release	United States	Broadcast Media	Media & Information	643,996 <sup>[1]</sup> visitors/month
	VDVM-TV IND-25 [Washington, DC] Inline 🖵 View Release	United States	Broadcast Media	Media & Information	609,680 <sup>[1]</sup> visitors/month
	SNW [Wichita, KS]	United States	Broadcast Media	Media & Information	604,897 <sup>[1]</sup> visitors/month
	VANE [Fort Wayne, IN] Inline 🖵 View Release	United States	Broadcast Media	Media & Information	595,453 <sup>[1]</sup> visitors/month
	VBRE/WYOU [Wilkes-Barre, PA]	United States	Broadcast Media	Media & Information	595,400 <sup>[1]</sup> visitors/month
	VFRV [Green Bay, WI] Inline 🖵 View Release	United States	Broadcast Media	Media & Information	588,841 <sup>[1]</sup> visitors/month
	ITV Island News, Honolulu, Hawaii Inline 🖵 View Release	United States	Newspaper	Media & Information	586,088 <sup>[1]</sup> visitors/month
	DVFN Inline 🖵 View Release	United States	Financial News Service	Financial	581,314 <sup>[1]</sup> visitors/month
	VIVB [Buffalo, NY] Inline 🖵 View Release	United States	Broadcast Media	Media & Information	577,087 <sup>[1]</sup> visitors/month
	VROC/WUHF/WZDX [Rochester, NY]	United States	Broadcast Media	Media & Information	573,570 <sup>[1]</sup> visitors/month
	VTEN/ WXXA-TV [Albany, NY] Inline 🖵 View Release	United States	Broadcast Media	Media & Information	533,897 <sup>[1]</sup> visitors/month
	VJTV-TV CBS-12 [Jackson, MS] Inline ☐ View Release	United States	Broadcast Media	Media & Information	529,935 <sup>[1]</sup> visitors/month
	SNT-TV NBC-27 [Topeka, KS]	United States	Broadcast Media	Media & Information	516,197 <sup>[1]</sup> visitors/month

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Kelo-	KELO [Sioux Falls, SD] Online 🖵 View Release	United States	Broadcast Media	Media & Information	515,945 <sup>[1]</sup> visitors/month
KVOA, Tucson, AZ	KVOA, Tucson, AZ Online 🖵 View Release	United States	Newspaper	Media & Information	511,155 <sup>[1]</sup> visitors/month
<b>&amp;KARK</b> .com	KARK-TV NBC-4 [Little Rock, AR] Online  Uiew Release	United States	Broadcast Media	Media & Information	502,328 <sup>[1]</sup> visitors/month
NEWS	WHNT [Huntsville, AL] Online  View Release	United States	Broadcast Media	Media & Information	499,355 <sup>[1]</sup> visitors/month
OCBS42	WIAT [Birmingham, AL] Online 🖵 View Release	United States	Broadcast Media	Media & Information	462,587 <sup>[1]</sup> visitors/month
channel 🚺 wihl	WJHL-TV/ABC Tri-Cities [Johnson City, TN] Online  View Release	United States	Broadcast Media	Media & Information	447,964 <sup>[1]</sup> visitors/month
LOCALSYR.com	WSYR-TV ABC-9 NewsChannel [Syracuse, NY] Online  View Release	United States	Broadcast Media	Media & Information	438,087 <sup>[1]</sup> visitors/month
12 WBOY	WBOY [Clarksburg, WV] Online 🖵 View Release	United States	Broadcast Media	Media & Information	420,890 <sup>[1]</sup> visitors/month
<b>#KGET.</b> com	KGET [Bakersfield, CA] Online  View Release	United States	Broadcast Media	Media & Information	408,123 <sup>[1]</sup> visitors/month
WTRF	WTRF [Wheeling, WV] Online - View Release	United States	Broadcast Media	Media & Information	406,388 <sup>[1]</sup> visitors/month
NEWS 5	WKRG [Mobile, AL] Online 🖵 View Release	United States	Broadcast Media	Media & Information	406,110 <sup>[1]</sup> visitors/month
	Mundiario Online 🖵 View Release	Spain	Newspaper	Media & Information	382,646 <sup>[1]</sup> visitors/month
KTSM.com	KTSM [El Paso, TX] Online 🖵 View Release	United States	Broadcast Media	Media & Information	377,752 <sup>[1]</sup> visitors/month
Des moines	WHO-TV NBC-13 [Des Moines, IA] Online 🖵 View Release	United States	Broadcast Media	Media & Information	377,347 <sup>[1]</sup> visitors/month
Albuquerque Journal, Albuquerque, New Mexico	Albuquerque Journal, Albuquerque, New Mexico Online 🖵 View Release	United States	Newspaper	Media & Information	359,431 <sup>[1]</sup> visitors/month
OWTAJ COM	WTAJ [Altoona, PA] Online 🖵 View Release	United States	Broadcast Media	Media & Information	354,846 <sup>[1]</sup> visitors/month
News 13 Coverage You Can Count On.	WBTW [Myrtle Beach, SC] Online 🖵 View Release	United States	Broadcast Media	Media & Information	353,827 <sup>[1]</sup> visitors/month
	WJZY-TV FOX-46 [Charlotte, NC] Online Uiew Release	United States	Broadcast Media	Media & Information	350,046 <sup>[1]</sup> visitors/month
	WSPA/WYCW [Spartanburg, SC] Online	United States	Broadcast Media	Media & Information	335,202 <sup>[1]</sup> visitors/month

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NBC Right Now, Kennewick, Washington	NBC Right Now, Kennewick, Washington Online 🖵 View Release	United States	Newspaper	Media & Information	334,213 <sup>[1]</sup> visitors/month
2 News, Las Vegas, Nevada	2 News, Las Vegas, Nevada Online 🖵 View Release	United States	Newspaper	Media & Information	317,645 <sup>[1]</sup> visitors/month
	WLNS-TV CBS-6 [Lansing, MI] Online	United States	Broadcast Media	Media & Information	314,249 <sup>[1]</sup> visitors/month
FOX NEWSROW	KXRM [Colorado Springs, CO] Online 🖵 View Release	United States	Broadcast Media	Media & Information	313,103 <sup>[1]</sup> visitors/month
news mystateline News .com	WQRF/WTVO [Rockford, IL] Online	United States	Broadcast Media	Media & Information	301,671 <sup>[1]</sup> visitors/month
ValleyCentral.com	KVEO-TV CBS-4 [Harlingen, TX] Online 🖵 View Release	United States	Broadcast Media	Media & Information	278,191 <sup>[1]</sup> visitors/month
Billings Gazette, Billings, Montana	Billings Gazette, Billings, Montana Online 🖵 View Release	United States	Newspaper	Media & Information	271,181 <sup>[1]</sup> visitors/month
everything Lubbock	KAMC/KLBK Online Uiew Release	United States	Broadcast Media	Media & Information	270,092 <sup>[1]</sup> visitors/month
KNWA KOX 24	KNWA/KFTA [Fayetteville, AR] Online 🖵 View Release	United States	Broadcast Media	Media & Information	263,841 <sup>[1]</sup> visitors/month
MM PANHANDLE	WMBB-TV ABC-13 [Panama City, FL] Online 🖵 View Release	United States	Broadcast Media	Media & Information	262,856 <sup>[1]</sup> visitors/month
	WNCT [Greenville, NC] Online 🖵 View Release	United States	Broadcast Media	Media & Information	259,227 <sup>[1]</sup> visitors/month
	WCBD-TV NBC-2 [Charleston, SC] Online 🖵 View Release	United States	Broadcast Media	Media & Information	258,114 <sup>[1]</sup> visitors/month
	KLFY [Lafayette, LA] Online 🖵 View Release	United States	Broadcast Media	Media & Information	257,035 <sup>[1]</sup> visitors/month
CIPROUD	WMBD-TV CBS 31 / WYZZ-TV FOX 43 [Peoria, IL] Online 🖵 View Release	United States	Broadcast Media	Media & Information	251,950 <sup>[1]</sup> visitors/month
WCIA.com	WCIA-TV CBS 3 [Champaign, IL] Online 🖵 View Release	United States	Broadcast Media	Media & Information	246,019 <sup>[1]</sup> visitors/month
NEWS 25. 7.	WEHT/WTVW [Evansville, IN] Online 🖵 View Release	United States	Broadcast Media	Media & Information	240,192 <sup>[1]</sup> visitors/month
FOXI6.com	KLRT-TV FOX-16 [Little Rock, AR] Online	United States	Broadcast Media	Media & Information	239,657 <sup>[1]</sup> visitors/month
Missoulian, Missoula, Montana	Missoulian, Missoula, Montana Online 🖵 View Release	United States	Newspaper	Media & Information	235,784 <sup>[1]</sup> visitors/month
YourErie	WJET-TV ABC-24 / WFXP-TV FOX-44 [Erie, PA] Online	United States	Broadcast Media	Media & Information	234,736 <sup>[1]</sup> visitors/month

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OZARKSFIRST.com	KOLR/KOZL [Springfield, MO] Online	United States	Broadcast Media	Media & Information	225,579 <sup>[1]</sup> visitors/month
WSAV.com On Your Side	WSAV [Savannah, GA] Online 🖵 View Release	United States	Broadcast Media	Media & Information	224,244 <sup>[1]</sup> visitors/month
	WJBF [Augusta, GA] Online 🖵 View Release	United States	Broadcast Media	Media & Information	215,384 <sup>[1]</sup> visitors/month
vour centralvalley.com	KSEE/KGPE [Fresno, CA] Online 🖵 View Release	United States	Broadcast Media	Media & Information	213,602 <sup>[1]</sup> visitors/month
Western Slope Now	KREX/KFQX/KGJT [Grand Junction, CO] Online UView Release	United States	Broadcast Media	Media & Information	212,160 <sup>[1]</sup> visitors/month
VICTORIA 🚺 ADVOCATE	Victoria Advocate [Victoria, TX] Online 🖵 View Release	United States	Newspaper	Media & Information	209,077 <sup>[1]</sup> visitors/month
VICTORIA 🚺 ADVOCATE	Victoria Advocate [Victoria, TX] Online 🖵 View Release	United States	Newspaper	Media & Information	209,077 <sup>[1]</sup> visitors/month
VICTORIA 🚺 ADVOCATE	Victoria Advocate [Victoria, TX] Online 🖵 View Release	United States	Newspaper	Media & Information	209,077 <sup>[1]</sup> visitors/month
Montana Right Now, Montana	Montana Right Now, Montana Online 🖵 View Release	United States	Newspaper	Media & Information	206,953 <sup>[1]</sup> visitors/month
Montana Right Now, Montana	Montana Right Now, Montana Online 🖵 View Release	United States	Newspaper	Media & Information	206,953 <sup>[1]</sup> visitors/month
KSN: homepage 12	KSNF/KODE [Joplin, MO] Online 🖵 View Release	United States	Broadcast Media	Media & Information	204,535 <sup>[1]</sup> visitors/month
<b>FOX</b> 56	WDKY-TV FOX-56 [Lexington, KY] Online 🖵 View Release	United States	Broadcast Media	Media & Information	202,464 <sup>[1]</sup> visitors/month
Wyoming Tribune Eagle, Cheyenne, Wyoming	Wyoming Tribune Eagle, Cheyenne, Wyoming Online 🖵 View Release	United States	Newspaper	Media & Information	197,498 <sup>[1]</sup> visitors/month
<b>BIBNEWS</b>	WOWK-TV CBS-13 [Charleston, WV] Online	United States	Broadcast Media	Media & Information	196,434 <sup>[1]</sup> visitors/month
WFXR	WFXR [Roanoke, VA Online 🖵 View Release	United States	Broadcast Media	Media & Information	193,143 <sup>[1]</sup> visitors/month
	KIAH [Houston, TX] Online 🖵 View Release	United States	Broadcast Media	Media & Information	192,968 <sup>[1]</sup> visitors/month
OCBS <b>59</b>	WVNS [Beckley, WV] Online  View Release	United States	Broadcast Media	Media & Information	188,374 <sup>[1]</sup> visitors/month
The Daily Sentinel, Grand Junction, Colorado	The Daily Sentinel, Grand Junction, Colorado Online 🖵 View Release	United States	Newspaper	Media & Information	188,124 <sup>[1]</sup> visitors/month
MY TWIN TIERS.COM	WETM-TV NBC-18 [Elmira, NY] Online 🖵 View Release	United States	Broadcast Media	Media & Information	185,396 <sup>[1]</sup> visitors/month

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				3	
Concho Valley	KLST/KSAN [San Angelo, TX] Online I View Release	United States	Broadcast Media	Media & Information	184,097 <sup>[1]</sup> visitors/month
Helena Independent Record, Helena, Montana	Helena Independent Record, Helena, Montana Online 🖵 View Release	United States	Newspaper	Media & Information	181,298 <sup>[1]</sup> visitors/month
Napa Valley Register, Napa, California	Napa Valley Register, Napa, California Online 🖵 View Release	United States	Newspaper	Media & Information	161,087 <sup>[1]</sup> visitors/month
Napa Valley Register, Napa, California	Napa Valley Register, Napa, California Online 🖵 View Release	United States	Newspaper	Media & Information	161,087 <sup>[1]</sup> visitors/month
KULR-8, Billings, Montana	KULR-8, Billings, Montana Online 🖵 View Release	United States	Newspaper	Media & Information	152,106 <sup>[1]</sup> visitors/month
KETKrecom	KETK-TV FOX-51 [Tyler, TX] Online  View Release	United States	Broadcast Media	Media & Information	148,244 <sup>[1]</sup> visitors/month
PUTTINC NORTH DAKOTA FIRST	KXMA/KXMB [Bismark, ND] Online 🖵 View Release	United States	Broadcast Media	Media & Information	147,477 <sup>[1]</sup> visitors/month
wrblecom	WRBL [Columbus, GA] Online 🖵 View Release	United States	Broadcast Media	Media & Information	146,017 <sup>[1]</sup> visitors/month
WGNO	WGNO [New Orleans, LA] Online I View Release	United States	Broadcast Media	Media & Information	143,757 <sup>[1]</sup> visitors/month
The Bulletin, Bend, Oregon	The Bulletin, Bend, Oregon Online - View Release	United States	Newspaper	Media & Information	137,695 <sup>[1]</sup> visitors/month
<b>SKTAL</b> news.com	KTAL-TV NBC-6 [Shreveport, LA] Online I View Release	United States	Broadcast Media	Media & Information	129,326 <sup>[1]</sup> visitors/month
BIG COUNTRY HOMEPAGE FORM	KTAB/KRBC [Abilene, TX] Online 🖵 View Release	United States	Broadcast Media	Media & Information	128,850 <sup>[1]</sup> visitors/month
Big Country News Connection, Spokane, Washington	Big Country News Connection, Spokane, Washington Online 🖵 View Release	United States	Newspaper	Media & Information	120,505 <sup>[1]</sup> visitors/month
Arizona Daily Sun, Flagstaff, Arizona	Arizona Daily Sun, Flagstaff, Arizona Online 🖵 View Release	United States	Newspaper	Media & Information	119,753 <sup>[1]</sup> visitors/month
brproud	WVLA [Baton Rouge, LA] Online  View Release	United States	Broadcast Media	Media & Information	117,851 <sup>[1]</sup> visitors/month
	WDHN-TV ABC [Webb, AL] Online  View Release	United States	Broadcast Media	Media & Information	115,747 <sup>[1]</sup> visitors/month
Lewiston Tribune, Lewiston, Idaho	Lewiston Tribune, Lewiston, Idaho Online 🖵 View Release	United States	Newspaper	Media & Information	115,671 <sup>[1]</sup> visitors/month
Myhighplainsem	Myhighplains Online  View Release	United States	Broadcast Media	Media & Information	115,022 <sup>[1]</sup> visitors/month
Textomais	KFDX-TV NBC-3 / KJTL-TV FOX-18 [Wichita Falls, TX] Online  View Release	United States	Broadcast Media	Media & Information	110,572 <sup>[1]</sup> visitors/month

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	Case 5.10-07-02554-5D Docume			0	
wabash Valleycom	WTWO-TV NBC-2/WAWV-TV ABC-38 MyWabashValley [Terre Haute IN] Online 🖵 View Release	United States	Broadcast Media	Media & Information	109,718 <sup>[1]</sup> visitors/month
RuadCities	QuadCities WHBF-TV CBS-4 / KLJB-TV FOX-18 [Rock Island, IL] Online 🖵 View Release	United States	Broadcast Media	Media & Information	104,235 <sup>[1]</sup> visitors/month
Portland Tribune, Portland, Oregon	Portland Tribune, Portland, Oregon Online  View Release	United States	Newspaper	Media & Information	104,219 <sup>[1]</sup> visitors/month
Tribune	Albert Lea Tribune [Albert Lea, MN] Online 🖵 View Release	United States	Newspaper	Media & Information	102,700 <sup>[1]</sup> visitors/month
The Daily News, Longview, Washington	The Daily News, Longview, Washington Online  View Release	United States	Newspaper	Media & Information	100,729 <sup>[1]</sup> visitors/month
NOW 04	WTTV [Indianapolis, IN] Online 🖵 View Release	United States	Broadcast Media	Media & Information	98,505 <sup>[1]</sup> visitors/month
Casper Star- Tribune [Casper, WY]	Casper Star-Tribune [Casper, WY] Online  다 View Release	United States	Newspaper	Media & Information	96,901 <sup>[1]</sup> visitors/month
News Miner, Fair	News Miner, Fair Online 🖵 View Release	United States	Newspaper	Media & Information	95,948 <sup>[1]</sup> visitors/month
News Miner, Fair	News Miner, Fair Online 🖵 View Release	United States	Newspaper	Media & Information	95,948 <sup>[1]</sup> visitors/month
FOX 40 WICZ-TV BINGHAMITON	WICZ-TV FOX-40 [Binghamton, NY] Online	United States	Broadcast Media	Media & Information	95,304 <sup>[1]</sup> visitors/month
FOX 44 NEWS.com	KWKT-TV FOX-44 / KYLE-TV MyNetworkTV [Woodway, TX] Online 🖵 View Release	United States	Broadcast Media	Media & Information	89,889 <sup>[1]</sup> visitors/month
Santa Maria Times, Santa Maria, California	Santa Maria Times, Santa Maria, California Online 🖵 View Release	United States	Newspaper	Media & Information	88,136 <sup>[1]</sup> visitors/month
Gazette- Times, Corvallis, Oregon	Gazette-Times, Corvallis, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	87,857 <sup>[1]</sup> visitors/month
my <b>arklamiss</b> com	KARD/KTVE [West Monroe, LA] Online I View Release	United States	Broadcast Media	Media & Information	87,229 <sup>[1]</sup> visitors/month
The Desert Review, El Centro, California	The Desert Review, El Centro, California Online 🖵 View Release	United States	Newspaper	Media & Information	86,122 <sup>[1]</sup> visitors/month
Elko Daily Free Press, Elko, Nevada	Elko Daily Free Press, Elko, Nevada Online 🖵 View Release	United States	Newspaper	Media & Information	85,969 <sup>[1]</sup> visitors/month
SIOUXLAND Proud	KCAU-TV ABC-9 Siouxland Proud [Sioux City, IA] Online  View Release	United States	Broadcast Media	Media & Information	85,131 <sup>[1]</sup> visitors/month
The News- Review, Roseburg, Oregon	The News-Review, Roseburg, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	80,745 <sup>[1]</sup> visitors/month
Montana Standard, Butte, Montana	Montana Standard, Butte, Montana Online 🖵 View Release	United States	Newspaper	Media & Information	76,863 <sup>[1]</sup> visitors/month

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	Case 5.10-CV-02554-5D Docume		5 FIIEU 10/31/24 I		
Salisbury	Salisbury Post Online TView Release	United States	Newspaper	Media & Information	76,417 <sup>[1]</sup> visitors/month
Las Vegas Optic, Las Vegas, New Mexico	Las Vegas Optic, Las Vegas, New Mexico Online I View Release	United States	Newspaper	Media & Information	74,369 <sup>[1]</sup> visitors/month
The Vicksburg Post.	The Vicksburg Post Online  View Release	United States	Newspaper	Media & Information	74,321 <sup>[1]</sup> visitors/month
The Daily Californian, Berkeley, California	The Daily Californian, Berkeley, California Online 🖵 View Release	United States	Newspaper	Media & Information	74,314 <sup>[1]</sup> visitors/month
Tri-Valley Times, Pleasanton, California	Tri-Valley Times, Pleasanton, California Online 🖵 View Release	United States	Newspaper	Media & Information	74,070 <sup>[1]</sup> visitors/month
Times-News, Twin Falls, Idaho	Times-News, Twin Falls, Idaho Online 🖵 View Release	United States	Newspaper	Media & Information	72,171 <sup>[1]</sup> visitors/month
Times-News, Twin Falls, Idaho	Times-News, Twin Falls, Idaho Online 🖵 View Release	United States	Newspaper	Media & Information	72,171 <sup>[1]</sup> visitors/month
NEWS CHANNEL NEBRASKA	NCN: Panhandle - News Channel Nebraska [Grand Island, NE] Online 🖵 View Release	United States	Broadcast Media	Media & Information	68,852 <sup>[1]</sup> visitors/month
BINGHAMTON homepage	WBGH/WIVT [Binghamton, NY] Online  다 View Release	United States	Broadcast Media	Media & Information	67,804 <sup>[1]</sup> visitors/month
Mountain Democrat, Placerville, California	Mountain Democrat, Placerville, California Online 🖵 View Release	United States	Newspaper	Media & Information	66,830 <sup>[1]</sup> visitors/month
The Westside Current, Houston, Texas	The Westside Current, Houston, Texas Online  Uiew Release	United States	Newspaper	Media & Information	66,456 <sup>[1]</sup> visitors/month
Aspen Daily News, Aspen, Colorado	Aspen Daily News, Aspen, Colorado Online 🖵 View Release	United States	Newspaper	Media & Information	66,391 <sup>[1]</sup> visitors/month
Daily Republic, Fairfield, California	Daily Republic, Fairfield, California Online 🖵 View Release	United States	Newspaper	Media & Information	65,180 <sup>[1]</sup> visitors/month
CUU33 good fun	KDAF-TV CW-33 [Dallas, TX] Online 🖵 View Release	United States	Broadcast Media	Media & Information	65,039 <sup>[1]</sup> visitors/month
myChamplainValley	WFFF-TV FOX 44 / WVNY-TV ABC-22 [Colchester, VT] Online 🖵 View Release	United States	Broadcast Media	Media & Information	64,949 <sup>[1]</sup> visitors/month
Your Basin	KMID/KPEJ [Odessa, TX] Online  다 View Release	United States	Broadcast Media	Media & Information	63,556 <sup>[1]</sup> visitors/month
KPVI News 6, Pocatello, Idaho	KPVI News 6, Pocatello, Idaho Online 🖵 View Release	United States	Newspaper	Media & Information	63,326 <sup>[1]</sup> visitors/month
Moscow- Pullman Daily News, Moscow, Idaho	Moscow-Pullman Daily News, Moscow, Idaho Online 🖵 View Release	United States	Newspaper	Media & Information	62,206 <sup>[1]</sup> visitors/month
Pinal Central [Casa Grande, AZ]	Pinal Central [Casa Grande, AZ] Online 🖵 View Release	United States	Newspaper	Media & Information	58,780 <sup>[1]</sup> visitors/month

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The Democrat	Natchez Democrat Online 🖵 View Release	United States	Newspaper	Media & Information	58,441 <sup>[1]</sup> visitors/month
Daily News	LaGrange Daily News Online 🖵 View Release	United States	Newspaper	Media & Information	56,768 <sup>[1]</sup> visitors/month
Lodi News- Sentinel, Lodi, California	Lodi News-Sentinel, Lodi, California Online 🖵 View Release	United States	Newspaper	Media & Information	51,773 <sup>[1]</sup> visitors/month
Appeal- Democrat, Marysville/Yuba City, California	Appeal-Democrat, Marysville/Yuba City, California Online 및 View Release	United States	Newspaper	Media & Information	51,579 <sup>[1]</sup> visitors/month
Appeal- Democrat, Marysville/Yuba City, California	Appeal-Democrat, Marysville/Yuba City, California Online 및 View Release	United States	Newspaper	Media & Information	51,579 <sup>[1]</sup> visitors/month
	Ellensburg Daily Record [Ellensburg, WA] Online - View Release	United States	Newspaper	Media & Information	50,963 <sup>[1]</sup> visitors/month
Albany Democrat- Herald, Albany, Oregon	Albany Democrat-Herald, Albany, Oregon Online - View Release	United States	Newspaper	Media & Information	50,940 <sup>[1]</sup> visitors/month
News	NEWSNet Online 🖵 View Release	United States	Broadcast Media	Media & Information	50,649 <sup>[1]</sup> visitors/month
Gillette News Record, Gillette, Wyoming	Gillette News Record, Gillette, Wyoming Online 및 View Release	United States	Newspaper	Media & Information	50,634 <sup>[1]</sup> visitors/month
Columbia Gorge News, Hood River, Oregon	Columbia Gorge News, Hood River, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	50,059 <sup>[1]</sup> visitors/month
<b>magnoliastatelive</b> Mississionis News Source	Magnolia State Live Online - View Release	United States	Newspaper	Media & Information	49,450 <sup>[1]</sup> visitors/month
Fontana Herald News, Fontana, California	Fontana Herald News, Fontana, California Online 🖵 View Release	United States	Newspaper	Media & Information	49,128 <sup>[1]</sup> visitors/month
	, WMICentral.com, Iron Mountain, Michigan Online 🖵 View Release	United States	Newspaper	Media & Information	48,714 <sup>[1]</sup> visitors/month
The Davis Enterprise, Davis, California	The Davis Enterprise, Davis, California Online - View Release	United States	Newspaper	Media & Information	47,661 <sup>[1]</sup> visitors/month
Estes Park News, Estes Park, Colorado	Estes Park News, Estes Park, Colorado Online - View Release	United States	Newspaper	Media & Information	46,089 <sup>[1]</sup> visitors/month
Hanford Sentinel, Hanford, California	Hanford Sentinel, Hanford, California Online 🖵 View Release	United States	Newspaper	Media & Information	46,078 <sup>[1]</sup> visitors/month
One News Page	One News Page Online 및 View Release	Hong Kong	Information Website	General	45,703 <sup>[1]</sup> visitors/month
One News Page	One News Page Online  Uiew Release	Hong Kong	Information Website	General	45,703 <sup>[1]</sup> visitors/month

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Taos News, Taos, New Mexico	Taos News, Taos, New Mexico Online  ☐ View Release	United States	Newspaper	Media & Information	45,275 <sup>[1]</sup> visitors/month
Herald	Austin Daily Herald Online  View Release	United States	Newspaper	Media & Information	44,697 <sup>[1]</sup> visitors/month
The News	Port Arthur News Online - View Release	United States	Newspaper	Media & Information	44,688 <sup>[1]</sup> visitors/month
East Oregonian, Pendleton, Oregon	East Oregonian, Pendleton, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	43,239 <sup>[1]</sup> visitors/month
THE OXFORD EXCLE	The Oxford Eagle Online TView Release	United States	Newspaper	Media & Information	43,012 <sup>[1]</sup> visitors/month
The Union, Grass Valley, California	The Union, Grass Valley, California Online  View Release	United States	Newspaper	Media & Information	42,911 <sup>[1]</sup> visitors/month
SHELBY COUNTY REPORTER Riders) bestored bestore	Shelby County Reporter Online I View Release	United States	Newspaper	Media & Information	42,651 <sup>[1]</sup> visitors/month
DAILY NEWS	Washington Daily News Online TView Release	United States	Newspaper	Media & Information	42,418 <sup>[1]</sup> visitors/month
INFORM NY	WWTI-TV ABC-50 [Watertown, NY] Online I View Release	United States	Broadcast Media	Media & Information	40,557 <sup>[1]</sup> visitors/month
<b>Upplateseren</b>	WJMN-TV CBS 3 [Escanaba, WI] Online 🖵 View Release	United States	Broadcast Media	Media & Information	40,554 <sup>[1]</sup> visitors/month
NEWS CHANNEL NORTH LAST NERASLA	NCN: Northeast - News Channel Nebraska [Norfolk, NE] Online  다 View Release	United States	Broadcast Media	Media & Information	39,184 <sup>[1]</sup> visitors/month
NEWS CHANNEL SOUTHEAST NEERASKA	NCN: Southeast - News Channel Nebraska [Beatrice, NE] Online 🖵 View Release	United States	Broadcast Media	Media & Information	38,729 <sup>[1]</sup> visitors/month
LeaderPublications	Leader Publications Online TView Release	United States	Newspaper	Media & Information	38,712 <sup>[1]</sup> visitors/month
Suffolk News Herald	The Suffolk News-Herald Online  View Release	United States	Newspaper	Media & Information	37,147 <sup>[1]</sup> visitors/month
NCWLIFE, Wenatchee, Washington	NCWLIFE, Wenatchee, Washington Online  View Release	United States	Newspaper	Media & Information	36,891 <sup>[1]</sup> visitors/month
The Union Democrat, Sonora, California	The Union Democrat, Sonora, California Online 🖵 View Release	United States	Newspaper	Media & Information	36,530 <sup>[1]</sup> visitors/month
Imperial Valley Press, El Centro, California	Imperial Valley Press, El Centro, California Online 🖵 View Release	United States	Newspaper	Media & Information	36,395 <sup>[1]</sup> visitors/month
Imperial Valley Press, El Centro, California	Imperial Valley Press, El Centro, California Online 🖵 View Release	United States	Newspaper	Media & Information	36,395 <sup>[1]</sup> visitors/month
Mohave Daily News, Bullhead City, AZ	Mohave Daily News, Bullhead City, AZ Online TView Release	United States	Newspaper	Media & Information	36,052 <sup>[1]</sup> visitors/month

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	Case 3.18-CV-02354-JD DUCUME	.m 200 C	1 11CU 10/01/24	1 uge 04 01 100	
Roswell Daily Record, Roswell, New Mexico	Roswell Daily Record, Roswell, New Mexico Online TView Release	United States	Newspaper	Media & Information	35,883 <sup>[1]</sup> visitors/month
	NCN: River Country - NewsChannelNebraska [Nebraska City, NE] Online U View Release	United States	Broadcast Media	Media & Information	35,850 <sup>[1]</sup> visitors/month
WKBN 27.	WYTV-TV ABC-33 [Youngstown, OH] Online TView Release	United States	Broadcast Media	Media & Information	34,370 <sup>[1]</sup> visitors/month
Lompoc Record, Lompoc, California	Lompoc Record, Lompoc, California Online 🖵 View Release	United States	Newspaper	Media & Information	33,513 <sup>[1]</sup> visitors/month
Your Oregon News, Oregon	Your Oregon News, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	32,879 <sup>[1]</sup> visitors/month
The Daily Astorian, Astoria, Oregon	The Daily Astorian, Astoria, Oregon Online Uiew Release	United States	Newspaper	Media & Information	32,791 <sup>[1]</sup> visitors/month
troymessenger.com	The Troy Messenger Online 🖵 View Release	United States	Newspaper	Media & Information	32,734 <sup>[1]</sup> visitors/month
Blue Mountain Eagle, John Day, Oregon	Blue Mountain Eagle, John Day, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	32,464 <sup>[1]</sup> visitors/month
NEWS CHANNEL PLATE VALLES	NCN: Platte Valley - News Channel Nebraska [Columbus, NE] Online View Release	United States	Broadcast Media	Media & Information	31,783 <sup>[1]</sup> visitors/month
Ravalli Republic, Hamilton, Montana	Ravalli Republic, Hamilton, Montana Online 🖵 View Release	United States	Newspaper	Media & Information	31,645 <sup>[1]</sup> visitors/month
Tribune.com	Ironton Tribune Online 🖵 View Release	United States	Newspaper	Media & Information	30,067 <sup>[1]</sup> visitors/month
Redmond Spokesman, Redmond, Oregon	Redmond Spokesman, Redmond, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	29,780 <sup>[1]</sup> visitors/month
The Winchester Sun	Winchester Sun Online 🖵 View Release	United States	Newspaper	Media & Information	29,604 <sup>[1]</sup> visitors/month
Forest Grove News-Times, Forest Grove, Oregon	Forest Grove News-Times, Forest Grove, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	29,489 <sup>[1]</sup> visitors/month
Buffalo Bulletin, Buffalo, Wyoming	Buffalo Bulletin, Buffalo, Wyoming Online Uiew Release	United States	Newspaper	Media & Information	28,773 <sup>[1]</sup> visitors/month
SWX Local Sports, Montana	SWX Local Sports, Montana Online 🖵 View Release	United States	Newspaper	Media & Information	28,297 <sup>[1]</sup> visitors/month
Elizabethton Star	Elizabethton Star Online 🖵 View Release	United States	Newspaper	Media & Information	27,712 <sup>[1]</sup> visitors/month
IDAILY LEADER	Daily Leader Online 🖵 View Release	United States	Newspaper	Media & Information	27,628 <sup>[1]</sup> visitors/month
Antelope Valley Press, Palmdale/Lancas California	Antelope Valley Press, Palmdale/Lancaster, California Online View Release	United States	Newspaper	Media & Information	27,575 <sup>[1]</sup> visitors/month

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@THE COASTLAND TIMES	The Coastland Times Online  View Release	United States	Newspaper	Media & Information	27,348 <sup>[1]</sup> visitors/month
<b>CW</b> homepage.com	CNYhomepage Online  View Release	United States	Broadcast Media	Media & Information	27,334 <sup>[1]</sup> visitors/month
Porterville Recorder, Porterville, California	Porterville Recorder, Porterville, California Online  View Release	United States	Newspaper	Media & Information	26,779 <sup>[1]</sup> visitors/month
Portal de Finanças Q 10 <sup>10</sup>	Portal de Financas Online 🖵 View Release	Brazil	Online News Sites & Other Influencers	Financial	26,427 <sup>[1]</sup> visitors/month
The Farmville Herald	The Farmville Herald Online  Uiew Release	United States	Newspaper	Media & Information	26,340 <sup>[1]</sup> visitors/month
American Press	American Press Online 🖵 View Release	United States	Newspaper	Media & Information	25,797 <sup>[1]</sup> visitors/month
Rio Grande Sun, Espanola, New Mexico	Rio Grande Sun, Espanola, New Mexico Online 🖵 View Release	United States	Newspaper	Media & Information	25,069 <sup>[1]</sup> visitors/month
News-Herald.com	The Roanoke Chowan News Herald Online 🖵 View Release	United States	Newspaper	Media & Information	24,905 <sup>[1]</sup> visitors/month
	Alexander City Outlook Online 🖵 View Release	United States	Newspaper	Media & Information	24,737 <sup>[1]</sup> visitors/month
Chandler News, Chandler, AZ	Chandler News, Chandler, AZ Online  View Release	United States	Newspaper	Media & Information	24,470 <sup>[1]</sup> visitors/month
The Press, Brentwood, California	The Press, Brentwood, California Online  View Release	United States	Newspaper	Media & Information	24,047 <sup>[1]</sup> visitors/month
Lake Oswego Review, Lake Oswego, Oregon	Lake Oswego Review, Lake Oswego, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	23,990 <sup>[1]</sup> visitors/month
LOBSERVATEUR	L'Observateur Online 🖵 View Release	United States	Newspaper	Media & Information	23,815 <sup>[1]</sup> visitors/month
Kingman Miner, Kingman AZ	Kingman Miner, Kingman AZ Online 🖵 View Release	United States	Newspaper	Media & Information	22,597 <sup>[1]</sup> visitors/month
Gilbert Sun, Gilbert AZ	Gilbert Sun, Gilbert AZ Online 🖵 View Release	United States	Newspaper	Media & Information	22,523 <sup>[1]</sup> visitors/month
State Inurnal	The State Journal Online 🖵 View Release	United States	Newspaper	Media & Information	22,214 <sup>[1]</sup> visitors/month
The Outlook, Gresham, Oregon	The Outlook, Gresham, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	22,204 <sup>[1]</sup> visitors/month
Hermiston Herald, Hermiston, Oregon	Hermiston Herald, Hermiston, Oregon Online  View Release	United States	Newspaper	Media & Information	22,157 <sup>[1]</sup> visitors/month
Star-News	The Andalusia Star-News Online	United States	Newspaper	Media & Information	21,829 <sup>[1]</sup> visitors/month
PHL17 🏪	WPHL [Philadelphia, PA] Online	United States	Broadcast Media	Media & Information	21,730 <sup>[1]</sup> visitors/month

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	Case 3.10-07-02354-3D Docume		5 FIIEU 10/31/24 r	age ee e. 200	
Chinook Observer, Long Beach, Washington	Chinook Observer, Long Beach, Washington Online  View Release	United States	Newspaper	Media & Information	20,802 <sup>[1]</sup> visitors/month
QUIZAME 🛞	Quiza Me Online 🖵 View Release	United States	Online News Sites & Other Influencers	General	20,678 <sup>[1]</sup> visitors/month
THE WETUMPKA HERALD	The Wetumpka Herald Online  View Release	United States	Newspaper	Media & Information	20,271 <sup>[1]</sup> visitors/month
Picayune Item	Picayune Item Online 🖵 View Release	United States	Newspaper	Media & Information	19,962 <sup>[1]</sup> visitors/month
Los Angeles Downtown News, Los Angeles, California	Los Angeles Downtown News, Los Angeles, California Online 🖵 View Release	United States	Newspaper	Media & Information	18,800 <sup>[1]</sup> visitors/month
Wallowa County Chieftain, Enterprise, Oregon	Wallowa County Chieftain, Enterprise, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	18,698 <sup>[1]</sup> visitors/month
Smithfield Times	Smithfield Times Online TView Release	United States	Newspaper	Media & Information	18,552 <sup>[1]</sup> visitors/month
Chino Champion, Chino, California	Chino Champion, Chino, California Online 🖵 View Release	United States	Newspaper	Media & Information	18,545 <sup>[1]</sup> visitors/month
VCReporter, Ventura County, California	VCReporter, Ventura County, California Online 🖵 View Release	United States	Newspaper	Media & Information	18,286 <sup>[1]</sup> visitors/month
The Daily Titan, Fullerton, California	The Daily Titan, Fullerton, California Online 🖵 View Release	United States	Newspaper	Media & Information	18,201 <sup>[1]</sup> visitors/month
Westside Connect, Sonoma County, California	Westside Connect, Sonoma County, California Online 🖵 View Release	United States	Newspaper	Media & Information	18,009 <sup>[1]</sup> visitors/month
Kodiak Daily Mirror, Kodiak, AK	Kodiak Daily Mirror, Kodiak, AK Online 🖵 View Release	United States	Newspaper	Media & Information	17,911 <sup>[1]</sup> visitors/month
The La Grande Observer, La Grande, Oregon	The La Grande Observer, La Grande, Oregon Online  다 View Release	United States	Newspaper	Media & Information	17,786 <sup>[1]</sup> visitors/month
Ledger Dispatch, Jackson, California	Ledger Dispatch, Jackson, California Online 🖵 View Release	United States	Newspaper	Media & Information	17,090 <sup>[1]</sup> visitors/month
NEWS CHANNEL ORAHA & LINCOLN	NCN: Metro - News Channel Nebraska [Omaha, NE] Online 🖵 View Release	United States	Broadcast Media	Media & Information	16,908 <sup>[1]</sup> visitors/month
Newport News-Times, Newport, Oregon	Newport News-Times, Newport, Oregon Online  View Release	United States	Newspaper	Media & Information	16,728 <sup>[1]</sup> visitors/month
Newberg Graphic, Newberg, Oregon	Newberg Graphic, Newberg, Oregon Online I View Release	United States	Newspaper	Media & Information	16,669 <sup>[1]</sup> visitors/month
Prescott Times, Prescott AZ	Prescott Times, Prescott AZ Online 🖵 View Release	United States	Newspaper	Media & Information	16,190 <sup>[1]</sup> visitors/month

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The Times-News	Valley Times-News Online 🖵 View Release	United States	Newspaper	Media & Information	15,766 <sup>[1]</sup> visitors/month
Tryon Daily Bulletin	The Tryon Daily Bulletin Online  Uiew Release	United States	Newspaper	Media & Information	15,732 <sup>[1]</sup> visitors/month
Yuma Sun, Yuma AZ	Yuma Sun, Yuma AZ Online 🖵 View Release	United States	Newspaper	Media & Information	15,554 <sup>[1]</sup> visitors/month
Yuma Sun, Yuma AZ	Yuma Sun, Yuma AZ Online 🖵 View Release	United States	Newspaper	Media & Information	15,554 <sup>[1]</sup> visitors/month
Beaverton Valley Times, Beaverton, Oregon	Beaverton Valley Times, Beaverton, Oregon Online TView Release	United States	Newspaper	Media & Information	15,522 <sup>[1]</sup> visitors/month
The Argonaut, Los Angeles, California	The Argonaut, Los Angeles, California Online  View Release	United States	Newspaper	Media & Information	15,277 <sup>[1]</sup> visitors/month
Fairfield Sun Times, Fairfield, Montana	Fairfield Sun Times, Fairfield, Montana Online 🖵 View Release	United States	Newspaper	Media & Information	15,155 <sup>[1]</sup> visitors/month
LEADER	Orange Leader Online 🖵 View Release	United States	Newspaper	Media & Information	14,811 <sup>[1]</sup> visitors/month
Santa Ynez Valley News, Santa Ynez Valley, California	Santa Ynez Valley News, Santa Ynez Valley, California Online 📮 View Release	United States	Newspaper	Media & Information	14,615 <sup>[1]</sup> visitors/month
The Baily News	The Bogalusa Daily News Online  Uiew Release	United States	Newspaper	Media & Information	14,593 <sup>[1</sup> visitors/month
NewsBlaze	NewsBlaze US Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	14,587 <sup>[1</sup> visitors/month
West Valley View, Avondale AZ	West Valley View, Avondale AZ Online  View Release	United States	Newspaper	Media & Information	14,583 <sup>[1</sup> visitors/month
The Greenville Advacate	The Greenville Advocate Online  Uiew Release	United States	Newspaper	Media & Information	13,616 <sup>[1</sup> visitors/month
Tehachapi News, Tehachapi, California	Tehachapi News, Tehachapi, California Online 🖵 View Release	United States	Newspaper	Media & Information	13,451 <sup>[1]</sup> visitors/month
Polk County Itemizer- Observer, Dallas, Oregon	Polk County Itemizer-Observer, Dallas, Oregon Online 📮 View Release	United States	Newspaper	Media & Information	13,171 <sup>[1</sup> visitors/month
Canadian <b>Inside</b> r	Canadian Insider Online 🖵 View Release	Canada	Financial News Service	Financial	12,989 <sup>[1</sup> visitors/month
The Advocate-Messenger	The Advocate-Messenger Online  View Release	United States	Newspaper	Media & Information	12,907 <sup>[1</sup> visitors/month
Cut Bank Pioneer Press, Cut Bank, Montana	Cut Bank Pioneer Press, Cut Bank, Montana Online  View Release	United States	Newspaper	Media & Information	12,851 <sup>[1]</sup> visitors/month
WT Proud	WLAX-TV FOX 28/45 [La Crosse, WI] Online  View Release	United States	Broadcast Media	Media & Information	12,826 <sup>[1]</sup> visitors/month

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	Case 5.10-02-02-02-04-0D Docume		5 THEU 10/51/24		
The Daily Independent, Ridgecrest, California	The Daily Independent, Ridgecrest, California Online 🖵 View Release	United States	Newspaper	Media & Information	12,625 <sup>[1]</sup> visitors/month
Kilgore News Herald, Kilgore, Texas	Kilgore News Herald, Kilgore, Texas Online ☐ View Release	United States	Newspaper	Media & Information	12,112 <sup>[1]</sup> visitors/month
Kilgore News Herald, Kilgore, Texas	Kilgore News Herald, Kilgore, Texas Online 🖵 View Release	United States	Newspaper	Media & Information	12,112 <sup>[1]</sup> visitors/month
Kilgore News Herald, Kilgore, Texas	Kilgore News Herald, Kilgore, Texas Online 🖵 View Release	United States	Newspaper	Media & Information	12,112 <sup>[1]</sup> visitors/month
WyoToday, Riverton, Wyoming	WyoToday, Riverton, Wyoming Online 🖵 View Release	United States	Newspaper	Media & Information	11,544 <sup>[1]</sup> visitors/month
<mark>a</mark> hora	Ahora News (New Jersey) Online 🖵 View Release	United States	Newspaper	Multicultural & Demographic	11,465 <sup>[1]</sup> visitors/month
Record Gazette, Banning, California	Record Gazette, Banning, California Online 🖵 View Release	United States	Newspaper	Media & Information	11,232 <sup>[1]</sup> visitors/month
The Post Searchlight	The Post-Searchlight Online  View Release	United States	Newspaper	Media & Information	11,179 <sup>[1]</sup> visitors/month
Cal OES News, Sacramento, California	Cal OES News, Sacramento, California Online 🖵 View Release	United States	Newspaper	Media & Information	11,006 <sup>[1]</sup> visitors/month
94	La Nueva 94 FM Online 🖵 View Release	Puerto Rico	Broadcast Media	Multicultural & Demographic	10,934 <sup>[1]</sup> visitors/month
Moorpark Acorn, Moorpark, California	Moorpark Acorn, Moorpark, California Online 🖵 View Release	United States	Newspaper	Media & Information	10,861 <sup>[1]</sup> visitors/month
The Jessamine Journal	Jessamine Journal Online 🖵 View Release	United States	Newspaper	Media & Information	10,261 <sup>[1]</sup> visitors/month
Baker City Herald, Baker City, Oregon	Baker City Herald, Baker City, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	10,231 <sup>[1]</sup> visitors/month
™StanlyNews@Press	The Stanly News & Press Online  View Release	United States	Newspaper	Media & Information	10,040 <sup>[1]</sup> visitors/month
The Madras Pioneer, Madras, Oregon	The Madras Pioneer, Madras, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	9,696 <sup>[1]</sup> visitors/month
The Clackamas Review, Milwaukie, Oregon	The Clackamas Review, Milwaukie, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	9,662 <sup>[1]</sup> visitors/month
Village Life, El Dorado Hills, California	Village Life, El Dorado Hills, California Online 🖵 View Release	United States	Newspaper	Media & Information	9,660 <sup>[1]</sup> visitors/month
Pasadena Weekly, Pasadena, California	Pasadena Weekly, Pasadena, California Online 🖵 View Release	United States	Newspaper	Media & Information	9,646 <sup>[1]</sup> visitors/month
Journal News Today	Journal News Today Online 🖵 View Release	United States	Online News Sites & Other Influencers	Media & Information	9,463 <sup>[1]</sup> visitors/month

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	Case 3.10-07-02334-3D Docume		5 THEU 10/51/24	- age 09 01 109	
Forefront Media News	Forefront Media News Online T View Release	United States	Online News Sites & Other Influencers	Media & Information	9,463 <sup>[1]</sup> visitors/month
	Cheap Fun Things To Do Online 🖵 View Release	United States	Online News Sites & Other Influencers	Travel & Leisure	9,463 <sup>[1]</sup> visitors/month
Seaside Signal, Seaside, Oregon	Seaside Signal, Seaside, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	9,195 <sup>[1]</sup> visitors/month
ALABAMA 🖸 NOW	Alabama Now Online 🖵 View Release	United States	Newspaper	Media & Information	8,444 [1] visitors/month
Idaho County Free Press, Grangeville, Idaho	Idaho County Free Press, Grangeville, Idaho Online 🖵 View Release	United States	Newspaper	Media & Information	8,443 <sup>[1]</sup> visitors/month
Res.	El Zol 106.7 FM Online 🖵 View Release	United States	Broadcast Media	Multicultural & Demographic	8,296 <sup>[1]</sup> visitors/month
Palos Verdes Peninsula News, Palos Verdes Estates, Californi	Palos Verdes Peninsula News, Palos Verdes Estates, Californi Online 🖵 View Release	United States	Newspaper	Media & Information	7,969 <sup>[1]</sup> visitors/month
Hi-Desert Star, Yucca Valley, California	Hi-Desert Star, Yucca Valley, California Online 🖵 View Release	United States	Newspaper	Media & Information	7,945 <sup>[1]</sup> visitors/month
The Charlotte Gazette	The Charlotte Gazette Online 🖵 View Release	United States	Newspaper	Media & Information	7,885 <sup>[1]</sup> visitors/month
Delta Wind, Bethel AK	Delta Wind, Bethel AK Online 🖵 View Release	United States	Newspaper	Media & Information	7,867 <sup>[1]</sup> visitors/month
Advertiser	The Clanton Advertiser Online 🖵 View Release	United States	Newspaper	Media & Information	7,551 <sup>[1]</sup> visitors/month
Redlands Community News, Redlands, California	Redlands Community News, Redlands, California Online 🖵 View Release	United States	Newspaper	Media & Information	7,504 <sup>[1]</sup> visitors/month
Arcadia News, Phoenix AZ	Arcadia News, Phoenix AZ Online 🖵 View Release	United States	Newspaper	Media & Information	7,473 <sup>[1]</sup> visitors/month
Plave 96.5FM	Play 96.5 FM Online 🖵 View Release	Puerto Rico	Broadcast Media	Multicultural & Demographic	7,320 <sup>[1]</sup> visitors/month
DEMOPOLIS Deside a sector	The Demopolis Times Online	United States	Newspaper	Media & Information	7,123 <sup>[1]</sup> visitors/month
CLABORNE PROGRESS	Claiborne Progress Online  View Release	United States	Newspaper	Media & Information	7,057 <sup>[1]</sup> visitors/month
Big Bear Grizzly, Big Bear Lake, California	Big Bear Grizzly, Big Bear Lake, California Online 🖵 View Release	United States	Newspaper	Media & Information	7,030 <sup>[1]</sup> visitors/month
Hillsboro Tribune, Hillsboro, Oregon	Hillsboro Tribune, Hillsboro, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	6,996 <sup>[1]</sup> visitors/month

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City Sun Times, Scottsdale AZ	City Sun Times, Scottsdale AZ Online 🖵 View Release	United States	Newspaper	Media & Information	6,768 <sup>[1]</sup> visitors/month
Columbia County Spotlight, St. Helens, Oregon	Columbia County Spotlight, St. Helens, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	6,706 <sup>[1]</sup> visitors/month
Inyo Register, Bishop, California	Inyo Register, Bishop, California Online 🖵 View Release	United States	Newspaper	Media & Information	6,656 <sup>[1]</sup> visitors/month
The Tidewater News	The Tidewater News Online  View Release	United States	Newspaper	Media & Information	6,654 <sup>[1]</sup> visitors/month
Trinity Journal, Weaverville, California	Trinity Journal, Weaverville, California Online  View Release	United States	Newspaper	Media & Information	6,567 <sup>[1]</sup> visitors/month
mega D	Mega TV Online 🖵 View Release	United States	Broadcast Media	Multicultural & Demographic	6,551 <sup>[1]</sup> visitors/month
Laughlin Times, Laughlin, Nevada	Laughlin Times, Laughlin, Nevada Online 🖵 View Release	United States	Newspaper	Media & Information	6,548 <sup>[1]</sup> visitors/month
Sunnyside Sun, Sunnyside, Washington	Sunnyside Sun, Sunnyside, Washington Online 🖵 View Release	United States	Newspaper	Media & Information	6,527 <sup>[1]</sup> visitors/month
Sēlma Times-Journal	The Selma Times-Journal Online  View Release	United States	Newspaper	Media & Information	6,382 <sup>[1]</sup> visitors/month
The World, Coos Bay, Oregon	The World, Coos Bay, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	6,335 <sup>[1]</sup> visitors/month
The Gazette- Democrat, Anna, Illinois	The Gazette-Democrat, Anna, Illinois Online 🖵 View Release	United States	Newspaper	Media & Information	6,243 <sup>[1]</sup> visitors/month
<b>1</b> <b>1</b> <b>1</b> <b>1</b> <b>1</b> <b>1</b> <b>1</b> <b>1</b> <b>1</b> <b>1</b>	La Zeta 93.7 FM Online 🖵 View Release	Puerto Rico	Broadcast Media	Multicultural & Demographic	6,123 <sup>[1]</sup> visitors/month
The Community Voice, Rohnert Park, California	The Community Voice, Rohnert Park, California Online 🖵 View Release	United States	Newspaper	Media & Information	5,998 <sup>[1]</sup> visitors/month
Mountain News, Lake Arrowhead, California	Mountain News, Lake Arrowhead, California Online 🖵 View Release	United States	Newspaper	Media & Information	5,950 <sup>[1]</sup> visitors/month
DAVIE COUNTY ENTERPRIJE RECORD	Davie County Enterprise Record Online  View Release	United States	Newspaper	Media & Information	5,945 <sup>[1]</sup> visitors/month
Exponent, Montana State University, Bozeman, Montana	Exponent, Montana State University, Bozeman, Montana Online 🖵 View Release	United States	Newspaper	Media & Information	5,864 <sup>[1]</sup> visitors/month
Chewelah Independent, Chewelah, Washington	Chewelah Independent, Chewelah, Washington Online  View Release	United States	Newspaper	Media & Information	5,762 <sup>[1]</sup> visitors/month
Central Oregonian, Prineville, Oregon	Central Oregonian, Prineville, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	5,546 <sup>[1]</sup> visitors/month

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				age 11 01 100	
Middlesboro News	Middlesboro News Online 🖵 View Release	United States	Newspaper	Media & Information	5,515 <sup>[1]</sup> visitors/month
Rivers of Living Water Missions	Rivers of Living Water Mission - Home Page Online C View Release	United States	Information Website	Travel & Leisure	5,499 <sup>[1]</sup> visitors/month
92.3	Zeta 92.3 FM Online 🖵 View Release	United States	Broadcast Media	Multicultural & Demographic	5,442 <sup>[1]</sup> visitors/month
Business Tribune, Portland, Oregon	Business Tribune, Portland, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	5,392 <sup>[1]</sup> visitors/month
Coronado Eagle & Journal, Coronado, California	Coronado Eagle & Journal, Coronado, California Online 🖵 View Release	United States	Newspaper	Media & Information	5,387 <sup>[1]</sup> visitors/month
news	Northern Michigan NEWSNet Online 🖵 View Release	United States	Broadcast Media	Media & Information	5,349 <sup>[1]</sup> visitors/month
	Wickenburg Sun Online 🖵 View Release	United States	Newspaper	Media & Information	5,213 <sup>[1]</sup> visitors/month
Oregon City News, Oregon City, Oregon	Oregon City News, Oregon City, Oregon Online - View Release	United States	Newspaper	Media & Information	5,104 <sup>[1]</sup> visitors/month
brewtonstandard.com East Escarbia County's online rews source	The Brewton Standard Online  View Release	United States	Newspaper	Media & Information	5,076 <sup>[1]</sup> visitors/month
The Sheet News, Mammoth Lakes, California	The Sheet News, Mammoth Lakes, California Online  다 View Release	United States	Newspaper	Media & Information	5,043 <sup>[1]</sup> visitors/month
Statesman Examiner, Colville, Washington	Statesman Examiner, Colville, Washington Online 🖵 View Release	United States	Newspaper	Media & Information	4,633 <sup>[1]</sup> visitors/month
The©Panolian	The Panolian Online 🖵 View Release	United States	Newspaper	Media & Information	4,484 <sup>[1]</sup> visitors/month
Char-Koosta News, Pablo, Montana	Char-Koosta News, Pablo, Montana Online 🖵 View Release	United States	Newspaper	Media & Information	4,321 <sup>[1]</sup> visitors/month
Valley Current, Oregon City, Oregon	Valley Current, Oregon City, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	4,302 <sup>[1]</sup> visitors/month
Atmore Advance	The Atmore Advance Online  View Release	United States	Newspaper	Media & Information	4,302 <sup>[1]</sup> visitors/month
CenLANow	WNTZ [Alexandria, LA] Online 🖵 View Release	United States	Broadcast Media	Media & Information	4,273 <sup>[1]</sup> visitors/month
	NEWSnet Detroit Online 🖵 View Release	United States	Broadcast Media	Media & Information	4,238 <sup>[1]</sup> visitors/month
Americus Times-Recorder	Americus Times-Recorder Online 🖵 View Release	United States	Newspaper	Media & Information	4,155 <sup>[1]</sup> visitors/month
Taft Midway Driller, Taft, California	Taft Midway Driller, Taft, California Online 🖵 View Release	United States	Newspaper	Media & Information	3,923 <sup>[1]</sup> visitors/month

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Canby Herald, Canby, Oregon	Canby Herald, Canby, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	3,807 <sup>[1]</sup> visitors/month
YOUR BIGSKY.COM	KHMT/KSVI [Billings, MT] Online TView Release	United States	Broadcast Media	Media & Information	3,780 <sup>[1]</sup> visitors/month
Wilsonville Spokesman, Wilsonville, Oregon	Wilsonville Spokesman, Wilsonville, Oregon Online  다 View Release	United States	Newspaper	Media & Information	3,763 [1] visitors/month
THE CHARGES DISPATCH	Kenbridge Victoria Dispatch Online 🖵 View Release	United States	Newspaper	Media & Information	3,556 <sup>[1]</sup> visitors/month
Courier	The Clemmons Courier Online I View Release	United States	Newspaper	Media & Information	3,335 [1] visitors/month
LATIN: BIZ	Latin Business Today Online 🖵 View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	3,315 [1] visitors/month
LATIN: BIZ	Latin Business Today Online 🖵 View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	3,315 <sup>[1]</sup> visitors/month
LATIN: BIZ	Latin Business Hoy Online  View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	3,315 [1] visitors/month
Interior Journal	The Interior Journal Online  View Release	United States	Newspaper	Media & Information	3,156 <sup>[1]</sup> visitors/month
Desert News, Apple Valley, California	Desert News, Apple Valley, California Online 🖵 View Release	United States	Newspaper	Media & Information	3,077 [1] visitors/month
Sportsnews	NEWSNet Sports Online TView Release	United States	Online News Sites & Other Influencers	Media & Information	3,061 <sup>[1]</sup> visitors/month
WINDSORWeekly	Windsor Weekly Online TView Release	United States	Newspaper	Media & Information	3,007 <sup>[1]</sup> visitors/month
	KJUN-TV / KFOL-TV HTV10 [Houma, LA] Online  View Release	United States	Broadcast Media	Media & Information	2,954 <sup>[1]</sup> visitors/month
Tucson Lifestyle, Tucson, AZ	Tucson Lifestyle, Tucson, AZ Online  View Release	United States	Newspaper	Media & Information	2,858 <sup>[1]</sup> visitors/month
Cordele Dispatch	Cordele Dispatch Online 🖵 View Release	United States	Newspaper	Media & Information	2,317 <sup>[1]</sup> visitors/month
Green & White Sheet, Tucson, AZ	Green & White Sheet, Tucson, AZ Online TView Release	United States	Newspaper	Media & Information	2,310 [1] visitors/month
Needles Desert Star, Needles, California	Needles Desert Star, Needles, California Online 🖵 View Release	United States	Newspaper	Media & Information	2,277 <sup>[1]</sup> visitors/month
Cala	Ismael Cala Online 🖵 View Release	United States	Blog	Multicultural & Demographic	2,128 <sup>[1]</sup> visitors/month
West Linn Tidings, West Linn, Oregon	West Linn Tidings, West Linn, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	2,090 [1 visitors/month
00	La Ley 107.9 FM Online 🖵 View Release	United States	Broadcast Media	Multicultural & Demographic	2,072 [1] visitors/month

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		111 200 3		uge 75 01 105	
🚺 The Tallassee Tribune	The Tallassee Tribune Online  View Release	United States	Newspaper	Media & Information	1,991 <sup>[1]</sup> visitors/month
Gates County Index	Gates County Index Online  View Release	United States	Newspaper	Media & Information	1,979 <sup>[1]</sup> visitors/month
Riverton Ranger, Riverton, Wyoming	Riverton Ranger, Riverton, Wyoming Online TView Release	United States	Newspaper	Media & Information	1,906 <sup>[1]</sup> visitors/month
<b>LEESVILLE</b> DAILY LEADER	Leesville Leader Online T View Release	United States	Newspaper	Media & Information	1,783 <sup>[1]</sup> visitors/month
DIARIO <i>HORIZONTE</i>	Diario Horizonte - CT Online 🖵 View Release	United States	Newspaper	Multicultural & Demographic	1,780 <sup>[1]</sup> visitors/month
<b>TIMES</b> of SAN DIEGO	Times of San Diego Online 🖵 View Release	United States	Newspaper	Media & Information	1,676 <sup>[1]</sup> visitors/month
Woodburn Independent, Woodburn, Oregon	Woodburn Independent, Woodburn, Oregon Online  View Release	United States	Newspaper	Media & Information	1,668 <sup>[1]</sup> visitors/month
Winters Express, Winters, California	Winters Express, Winters, California Online  View Release	United States	Newspaper	Media & Information	1,663 <sup>[1]</sup> visitors/month
Sandy Post, Sandy, Oregon	Sandy Post, Sandy, Oregon Online  View Release	United States	Newspaper	Media & Information	1,549 <sup>[1]</sup> visitors/month
Harlan Enterprise	Harlan Enterprise Online 🖵 View Release	United States	Newspaper	Media & Information	1,524 <sup>[1]</sup> visitors/month
The Gazette, GTG Gazette, Grant City, Missouri	The Gazette, GTG Gazette, Grant City, Missouri Online  View Release	United States	Newspaper	Media & Information	1,418 <sup>[1]</sup> visitors/month
Molalla Pioneer, Molalla, Oregon	Molalla Pioneer, Molalla, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	1,416 <sup>[1]</sup> visitors/month
The Gazette, Colorado Springs, Colorado	The Gazette, Colorado Springs, Colorado Online  View Release	United States	Newspaper	Media & Information	1,370 <sup>[1]</sup> visitors/month
The Prentiss Headlight	Prentiss Headlight Online 🖵 View Release	United States	Newspaper	Media & Information	1,318 <sup>[1]</sup> visitors/month
Go! Eastern Oregon, Eastern Oregon	Go! Eastern Oregon, Eastern Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	1,297 <sup>[1]</sup> visitors/month
NELOWNDES 🗟 Signal	Lowndes Signal Online 🖵 View Release	United States	Newspaper	Media & Information	1,274 <sup>[1]</sup> visitors/month
🖇 Sangri Times	Sangri Times Online 🖵 View Release	India	Online News Sites & Other Influencers	General	1,185 <sup>[1]</sup> visitors/month
Clearwater Tribune, Orofino, Idaho	Clearwater Tribune, Orofino, Idaho Online 🖵 View Release	United States	Newspaper	Media & Information	1,164 <sup>[1]</sup> visitors/month
Clearwater Progress, Orofino, Idaho	Clearwater Progress, Orofino, Idaho Online 🖵 View Release	United States	Newspaper	Media & Information	1,093 <sup>[1]</sup> visitors/month

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Eastern Progress, Richmond, Kentucky	Eastern Progress, Richmond, Kentucky Online  View Release	United States	Newspaper	Media & Information	1,079 <sup>[1]</sup> visitors/month
Eastern Progress, Richmond, Kentucky	Eastern Progress, Richmond, Kentucky Online  View Release	United States	Newspaper	Media & Information	1,079 <sup>[1]</sup> visitors/month
Eastern Progress, Richmond, Kentucky	Eastern Progress, Richmond, Kentucky Online  View Release	United States	Newspaper	Media & Information	1,079 <sup>[1]</sup> visitors/month
bluegrass live	Bluegrass Live Online	United States	Newspaper	Media & Information	1,069 <sup>[1]</sup> visitors/month
NickAds, Grand Junction, Colorado	NickAds, Grand Junction, Colorado Online 🖵 View Release	United States	Newspaper	Media & Information	1,049 <sup>[1]</sup> visitors/month
WNC BUSINESS Conset - Inform - Inspire	WNC Business Online 🖵 View Release	United States	Newspaper	Media & Information	1,019 <sup>[1]</sup> visitors/month
ChineseWire	ChineseWire Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	1,004 <sup>[1]</sup> visitors/month
Ashland	Ashland Town News Online	United States	Newspaper	Media & Information	986 <sup>[1]</sup> visitors/month
New Mexico Press Association, Albuquerque, New Mexico	New Mexico Press Association, Albuquerque, New Mexico Online 🖵 View Release	United States	Newspaper	Media & Information	969 <sup>[1]</sup> visitors/month
Journal	Luverne Journal Online 🖵 View Release	United States	Newspaper	Media & Information	964 <sup>[1]</sup> visitors/month
Sherwood Gazette, Sherwood, Oregon	Sherwood Gazette, Sherwood, Oregon Online  View Release	United States	Newspaper	Media & Information	958 <sup>[1]</sup> visitors/month
Buenos Dias NEBRASKA	Buenos Dias Nebraska Online 🖵 View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	931 <sup>[1]</sup> visitors/month
Journals	Holladay Journal Online 🖵 View Release	United States	Newspaper	Media & Information	911 <sup>[1]</sup> visitors/month
Estacada News, Estacada, Oregon	Estacada News, Estacada, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	853 <sup>[1]</sup> visitors/month
Fayetteville Connect	Fayetteville Connect Online  View Release	United States	Newspaper	Media & Information	810 <sup>[1]</sup> visitors/month
walnutcreek	Walnut Creek Magazine Online 🖵 View Release	United States	Newspaper	Media & Information	805 <sup>[1]</sup> visitors/month
THE CITY DUILDEN OF CHEMICAL	West Jordan Journal Online 🖵 View Release	United States	Newspaper	Media & Information	796 <sup>[1]</sup> visitors/month
GULFe MAIN	Gulf & Main Magazine Online 🖵 View Release	United States	Newspaper	Media & Information	785 <sup>[1]</sup> visitors/month
THE CHILLICOTHE HOMETOWN VICE	The Chillicothe Hometown Voice Online 🖵 View Release	United States	Newspaper	Media & Information	775 <sup>[1]</sup> visitors/month

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Journals	South Jordan Journal Online TView Release	United States	Newspaper	Media & Information	766 <sup>[1]</sup> visitors/month
RSWLIVING Regional Southwest Florids Communities	RSW Living Magazine [Sanibel, FL] Online 🖵 View Release	United States	Newspaper	Media & Information	765 <sup>[1]</sup> visitors/month
MEMBER SUPPORTED	Washington City Paper [Washington, DC] Online 🖵 View Release	United States	Newspaper	General	751 <sup>[1]</sup> visitors/month
BocaLista	BocaLista Online 🖵 View Release	Puerto Rico	Online News Sites & Other Influencers	Multicultural & Demographic	704 <sup>[1]</sup> visitors/month
Chester County PRESS	Chester County Press Online 🖵 View Release	United States	Newspaper	Media & Information	692 <sup>[1]</sup> visitors/month
KANSAS CITY	Univision Kansas City Online 🖵 View Release	United States	Broadcast Media	Multicultural & Demographic	683 <sup>[1]</sup> visitors/month
Journals	Sugar House Journal Online 🖵 View Release	United States	Newspaper	Media & Information	675 <sup>[1]</sup> visitors/month
Journal Journal	Davis Journal Online 🖵 View Release	United States	Newspaper	Media & Information	662 <sup>[1]</sup> visitors/month
Journals	Midvale Journal Online 🖵 View Release	United States	Newspaper	Media & Information	656 <sup>[1]</sup> visitors/month
Columbia	Columbia Business Monthly Online  View Release	United States	Newspaper	Media & Information	650 <sup>[1]</sup> visitors/month
H BambuUP	BambuUp Online 🖵 View Release	Vietnam	Local	Tech	644 <sup>[1]</sup> visitors/month
99.5 Janz	99.5 JAMZ [Weldon, NC] Online 🖵 View Release	United States	Broadcast Media	Media & Information	643 <sup>[1]</sup> visitors/month
Journals	Sandy Journal Online 🖵 View Release	United States	Newspaper	Media & Information	640 <sup>[1]</sup> visitors/month
keatownpagnetill Norfolk & Wrentham	Norfolk & Wrentham News Online 🖵 View Release	United States	Newspaper	Media & Information	640 <sup>[1]</sup> visitors/month
EBRIDGE Media Inetworks	Bridge Media Networks Online 🖵 View Release	United States	Broadcast Media	Media & Information	635 <sup>[1]</sup> visitors/month
Folsom Local News Folson News, reporting the Inf obsen Culturela	Folsom Local News [Folsom, CA] Online 🖵 View Release	United States	Online News Sites & Other Influencers	Media & Information	619 <sup>[1]</sup> visitors/month
	La Familia de Broward Online 🖵 View Release	United States	Magazine	Multicultural & Demographic	618 <sup>[1]</sup> visitors/month
BEAUREGARDNEWS	Beauregard News Online 🖵 View Release	United States	Newspaper	Media & Information	605 <sup>[1]</sup> visitors/month
wzvc 15	NEWSnet Atlanta Online 🖵 View Release	United States	Broadcast Media	Media & Information	599 <sup>[1]</sup> visitors/month

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Medway & Millis	Medway & Millis News Online 🖵 View Release	United States	Newspaper	Media & Information	593 <sup>[1]</sup> visitors/month
Journals university to the second	Cottonwood Heights Journal Online  View Release	United States	Newspaper	Media & Information	572 <sup>[1]</sup> visitors/month
COUNTRAL	KLXS-FM 95.3 Online TView Release	United States	Broadcast Media	Media & Information	558 <sup>[1]</sup> visitors/month
MBNEWS	MB News Online 🖵 View Release	United States	Newspaper	Media & Information	551 <sup>[1]</sup> visitors/month
Security SEGUROS Solut, Fotborres y Segurdad Digital	SEGUROS, SALUD, PENSIONES & SEGURIDAD Online	United States	Online News Sites & Other Influencers	Multicultural & Demographic	548 <sup>[1]</sup> visitors/month
Natick	Natick Town News Online 🖵 View Release	United States	Newspaper	Media & Information	543 <sup>[1]</sup> visitors/month
Höpedale	Hopedale Town News Online 🖵 View Release	United States	Newspaper	Media & Information	538 <sup>[1]</sup> visitors/month
WDD2 EARL 98.3 Make Host State Hall Host State FM	WDLZ 98.3-FM [Murfreesboro, NC] Online 🖵 View Release	United States	Broadcast Media	Media & Information	538 <sup>[1]</sup> visitors/month
Journals	Herriman Journal Online 🖵 View Release	United States	Newspaper	Media & Information	526 <sup>[1]</sup> visitors/month
	Connect Iredell Online 🖵 View Release	United States	Newspaper	Media & Information	521 <sup>[1]</sup> visitors/month
	NEWSnet Columbus Online 🖵 View Release	United States	Broadcast Media	Media & Information	516 <sup>[1]</sup> visitors/month
The Bee News, Clarence, New York	The Bee News, Clarence, New York Online  Uiew Release	United States	Newspaper	Media & Information	514 <sup>[1]</sup> visitors/month
Stoti.com	Toti.com Online 🖵 View Release	United States	Newspaper	Media & Information	514 <sup>[1]</sup> visitors/month
	NEWSnet Augusta Online 🖵 View Release	United States	Broadcast Media	Media & Information	508 <sup>[1]</sup> visitors/month
<b>Chief</b>	KKYA-FM 93.1 Online 🖵 View Release	United States	Broadcast Media	Media & Information	495 <sup>[1]</sup> visitors/month
Journals HE MELICITICAL COMMENTATION	West Valley City Journal Online 🖵 View Release	United States	Newspaper	Media & Information	493 <sup>[1]</sup> visitors/month
Franklin	Franklin Town News Online 🖵 View Release	United States	Newspaper	Media & Information	492 <sup>[1]</sup> visitors/month
Foresthill Messenger, Foresthill, California	Foresthill Messenger, Foresthill, California Online - View Release	United States	Newspaper	Media & Information	480 <sup>[1]</sup> visitors/month
Journals	South Salt Lake Journal Online	United States	Newspaper	Media & Information	477 <sup>[1]</sup> visitors/month

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<sup>₽</sup> PrensA <sup>©</sup> HispanA	La Prensa Hispana Online 🖵 View Release	United States	Newspaper	Multicultural & Demographic	477 <sup>[1]</sup> visitors/month
Vida Vueva	Vida Nueva Online 🖵 View Release	United States	Newspaper	Multicultural & Demographic	475 <sup>[1]</sup> visitors/month
Journals	City Journals Online 🖵 View Release	United States	Newspaper	Media & Information	470 <sup>[1]</sup> visitors/month
Boulder Monitor, Boulder, Montana	Boulder Monitor, Boulder, Montana Online  View Release	United States	Newspaper	Media & Information	465 <sup>[1]</sup> visitors/month
CAPE CORAL & Reightoning Communities	Cape Coral Living Magazine Online 🖵 View Release	United States	Newspaper	Media & Information	458 <sup>[1]</sup> visitors/month
Queen Creek Tribune, Queen Creek AZ	Queen Creek Tribune, Queen Creek AZ Online 🖵 View Release	United States	Newspaper	Media & Information	444 <sup>[1]</sup> visitors/month
Coast River Business Journal, Astoria, Oregon	Coast River Business Journal, Astoria, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	435 <sup>[1]</sup> visitors/month
James of the Islands. Senter + Coperie & Sumuming Alemet	Times of the Islands Online  Uiew Release	United States	Newspaper	Media & Information	420 <sup>[1]</sup> visitors/month
Journals	Murray Journal Online 🖵 View Release	United States	Newspaper	Media & Information	413 <sup>[1]</sup> visitors/month
Holliston	Holliston Town News Online T View Release	United States	Newspaper	Media & Information	413 <sup>[1]</sup> visitors/month
KBEW-AM 1560 / KBEW- FM 98.1 COUNTRY [Blue Earth, MN]	KBEW-AM 1560 / KBEW-FM 98.1 COUNTRY [Blue Earth, MN] Online  View Release	United States	Broadcast Media	Media & Information	411 <sup>[1]</sup> visitors/month
<b>Winer</b>	WZZS-FM 106.9 La Número Uno / WTMY-AM 1280 La Número Uno Online 🖵 View Release	United States	Broadcast Media	Multicultural & Demographic	408 <sup>[1]</sup> visitors/month
Wyoming Press Association, Casper, Wyoming	Wyoming Press Association, Casper, Wyoming Online  View Release	United States	Newspaper	Media & Information	402 <sup>[1]</sup> visitors/month
SBugle	Bradfordville Bugle Online 🖵 View Release	United States	Newspaper	Media & Information	396 <sup>[1]</sup> visitors/month
	Southern Sports Today Online TView Release	United States	Broadcast Media	Media & Information	383 <sup>[1]</sup> visitors/month
Greenville.	Greenville Business Magazine Online 🖵 View Release	United States	Newspaper	Media & Information	380 <sup>[1]</sup> visitors/month
Journals	Millcreek Journal Online 🖵 View Release	United States	Newspaper	Media & Information	374 <sup>[1]</sup> visitors/month
CHATTY PATTY'S PLACE	Chatty Patty's Place Online 🖵 View Release	United States	Blog	Travel & Leisure	371 <sup>[1]</sup> visitors/month

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Journals	Taylorsville Journal Online 🖵 View Release	United States	Newspaper	Media & Information	370 <sup>[1]</sup> visitors/month
Cookistry's Kitchen Gadget and Food Reviews	Cookistry's Kitchen Gadget and Food Reviews Online  Uiew Release	United States	Blog	Retail & Consumer	368 <sup>[1]</sup> visitors/month
<b>O</b> MAHA	Omaha Magazine Online 🖵 View Release	United States	Newspaper	Media & Information	367 <sup>[1]</sup> visitors/month
NEWSnet Austin	NEWSnet Austin Online 🖵 View Release	United States	Broadcast Media	Media & Information	366 <sup>[1]</sup> visitors/month
Norwood	Norwood Town News Online 🖵 View Release	United States	Newspaper	Media & Information	364 <sup>[1]</sup> visitors/month
TAOS NEWS	Taos News Online 및 View Release	United States	Newspaper	Media & Information	363 <sup>[1]</sup> visitors/month
EAGLE OLS	KZZI-FM 95.9 Online 🖵 View Release	United States	Broadcast Media	Media & Information	349 <sup>[1]</sup> visitors/month
	Middletown Life Magazine Online 🖵 View Release	United States	Print Media	Media & Information	348 <sup>[1]</sup> visitors/month
C PRIME	WNOW Frankly Media Online 🖵 View Release	United States	Broadcast Media	Media & Information	347 <sup>[1]</sup> visitors/month
STYLE	Style Magazine Online 🖵 View Release	United States	Newspaper	Media & Information	342 <sup>[1]</sup> visitors/month
City News Vegas, Las Vegas, Nevada	City News Vegas, Las Vegas, Nevada Online 🖵 View Release	United States	Newspaper	Media & Information	337 <sup>[1]</sup> visitors/month
THE PODCAST PARK 🕌	The Podcast Park Online  View Release	United States	Broadcast Media	Media & Information	332 <sup>[1]</sup> visitors/month
	Univision Minnesota Online 🖵 View Release	United States	Broadcast Media	Multicultural & Demographic	330 <sup>[1]</sup> visitors/month
BONITA GESTERO and Neighboring Communities	Bonita & Estero Magazine Online 🖵 View Release	United States	Newspaper	Media & Information	318 <sup>[1]</sup> visitors/month
Univision	Univision Canada Online 🖵 View Release	Canada	Broadcast Media	Multicultural & Demographic	315 <sup>[1]</sup> visitors/month
NEWSnet Boise	NEWSnet Boise Online 🖵 View Release	United States	Online News Sites & Other Influencers	Media & Information	311 <sup>[1]</sup> visitors/month
(95.3)	WHLF 95.3 FM [South Boston, VA] Online  Uiew Release	United States	Broadcast Media	Media & Information	310 <sup>[1]</sup> visitors/month
ESTILOS ELOG	EstilosBlog Online 🖵 View Release	United States	Blog	Multicultural & Demographic	308 <sup>[1]</sup> visitors/month
Hattiesburg.Com	Hattiesburg.com Online TView Release	United States	Online News Sites & Other Influencers	Media & Information	300 <sup>[1]</sup> visitors/month

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	The Dam 94.3-FM Online  ↓ View Release	United States	Broadcast Media	Media & Information	300 <sup>[1]</sup> visitors/month
eNews Park Forest	eNews Park Forest Online 및 View Release	United States	Newspaper	Media & Information	295 <sup>[1]</sup> visitors/month
	NEWSNet Portland Online  View Release	United States	Broadcast Media	Media & Information	294 <sup>[1]</sup> visitors/month
Milliond	Mi Ciudad Tampa Bay Online 및 View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	292 <sup>[1]</sup> visitors/month
Periódico resease i els 1995 LA VOZ El Fortaxor de la Comunidad Latina	La Voz Hispanic News [Pasco, WA] Online 🖵 View Release	United States	Newspaper	Multicultural & Demographic	280 <sup>[1]</sup> visitors/month
WEST VIRGINIA LATINO WORKS	West Virginia Latino News Online 및 View Release	United States	News & Information Service	Multicultural & Demographic	277 <sup>[1]</sup> visitors/month
KYNT-AM 1450	KYNT-AM 1450 Online 및 View Release	United States	Broadcast Media	Media & Information	274 <sup>[1]</sup> visitors/month
	WPTM 102.3-FM [Weldon, NC] Online - View Release	United States	Broadcast Media	Media & Information	270 <sup>[1]</sup> visitors/month
(83)	WLUS 98.3 FM [Clarksville, VA] Online 🖵 View Release	United States	Broadcast Media	Media & Information	268 <sup>[1]</sup> visitors/month
el🍂 perico	El Perico Online 🖵 View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	260 <sup>[1]</sup> visitors/month
el🍂perico	El Perico Online 🖵 View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	260 <sup>[1]</sup> visitors/month
PIONEER	The Pioneer Online 및 View Release	United States	Newspaper	Media & Information	259 <sup>[1]</sup> visitors/month
	NEWSnet Buffalo Online 🖵 View Release	United States	Broadcast Media	Media & Information	259 <sup>[1]</sup> visitors/month
KHIK	KMLK 98.7-FM [El Dorado, AR] Online 🖵 View Release	United States	Broadcast Media	Media & Information	256 <sup>[1]</sup> visitors/month
580 3.7FM 145945	WCNN 680 AM / 93.7 FM [Atlanta, GA] Online 🖵 View Release	United States	Broadcast Media	Media & Information	255 <sup>[1]</sup> visitors/month
MONTANA LATINO Merce	Montana Latino News Online 🖵 View Release	United States	News & Information Service	Multicultural & Demographic	243 <sup>[1]</sup> visitors/month
	NEWSnet Los Angeles Online I View Release	United States	Online News Sites & Other Influencers	Media & Information	241 <sup>[1]</sup> visitors/month
	NEWSNet Santa Barbara Online I View Release	United States	Online News Sites & Other Influencers	Media & Information	233 <sup>[1]</sup> visitors/month
<b>\$</b>	WWDW 107.7-FM [Alberta, VA] Online The View Release	United States	Broadcast Media	Media & Information	232 <sup>[1]</sup> visitors/month

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Energia: Industria Comercia: Minería	Energía, Industria, Comercio y Minería Online 🖵 View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	231 <sup>[1]</sup> visitors/month
	Ismael Cala Foundation Online 🖵 View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	226 <sup>[1]</sup> visitors/month
	Gaby Natale Online 🖵 View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	222 <sup>[1]</sup> visitors/month
el Colombiano*	El Colombiano Online 🖵 View Release	United States	Newspaper	Multicultural & Demographic	220 <sup>[1]</sup> visitors/month
hood Magazine	hood Magazine Online 🖵 View Release	United States	Print Media	Media & Information	210 <sup>[1]</sup> visitors/month
PRENSA	Prensa Mexicana Online 🖵 View Release	United States	Newspaper	Multicultural & Demographic	206 <sup>[1]</sup> visitors/month
Hispanic PR Wire A SERVICE OF PR NEWSWIRE	Hispanic PR Wire Online 🖵 View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	205 <sup>[1]</sup> visitors/month
Hispanic PR Wire A SERVICE OF PR NEWSWIRE	Hispanic PR Wire Online ☐ View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	205 <sup>[1]</sup> visitors/month
967 WSHV Oti/VisiULeumi	WSHV 96.7 FM [South Hill, VA] Online 🖵 View Release	United States	Broadcast Media	Media & Information	198 <sup>[1]</sup> visitors/month
The Weekend Drive, Detroit, Michigan	The Weekend Drive, Detroit, Michigan Online  View Release	United States	Newspaper	Media & Information	195 <sup>[1]</sup> visitors/month
Journals HEALTY CONTRACTS	Draper Journal Online 🖵 View Release	United States	Newspaper	Media & Information	195 <sup>[1]</sup> visitors/month
Rewind 01019	WKSK 101.9 FM [South Boston, VA] Online  View Release	United States	Broadcast Media	Media & Information	194 <sup>[1]</sup> visitors/month
INSPIRE OFFICE	Inspired Foodery Online T View Release	United States	Blog	Food/Beverage	177 <sup>[1]</sup> visitors/month
	NEWSNet Pittsburgh Online 🖵 View Release	United States	Broadcast Media	Media & Information	176 <sup>[1]</sup> visitors/month
71063	Z106.3 FM Online 🖵 View Release	United States	Broadcast Media	Media & Information	175 <sup>[1]</sup> visitors/month
	NEWSNet Norfolk Online TView Release	United States	Broadcast Media	Media & Information	173 <sup>[1]</sup> visitors/month
A kansas	Hola Arkansas! Online 🖵 View Release	United States	Newspaper	Multicultural & Demographic	173 <sup>[1]</sup> visitors/month
	KCCR-AM 1240 [Pierre, SD] Online 🖵 View Release	United States	Broadcast Media	Media & Information	165 <sup>[1]</sup> visitors/month
	KCCR-FM 95.3 [Pierre, SD] Online 🖵 View Release	United States	Broadcast Media	Media & Information	160 <sup>[1]</sup> visitors/month

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TRANSPORTE Lipster & Descript Advanced	Transporte, Logística & Comercio Internacional Online 🖵 View Release	United States	Newspaper	Multicultural & Demographic	148 <sup>[1]</sup> visitors/month
en Delaware	Hoy en Delaware Online 🖵 View Release	United States	Newspaper	Multicultural & Demographic	148 <sup>[1]</sup> visitors/month
	WTRG 97.9-FM [Weldon, NC] Online 🖵 View Release	United States	Broadcast Media	Media & Information	144 <sup>[1]</sup> visitors/month
ealosAngeles.com	areaLosAngele Online 🖵 View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	144 <sup>[1]</sup> visitors/month
1045 The Dan com Danville's Glassie Hits	WWDN 104.5 FM [Danville, VA] Online - View Release	United States	Broadcast Media	Media & Information	141 <sup>[1]</sup> visitors/month
Wine Diva Lifestyle Attestebuit assed vice	Wine Diva Lifestyle Online 🖵 View Release	United States	Blog - Spirits, Cocktails, Beer & Wine	Retail & Consumer	138 <sup>[1]</sup> visitors/month
	NEWSNet West Palm Beach Online 🖵 View Release	United States	Broadcast Media	Media & Information	129 <sup>[1]</sup> visitors/month
	NEWSNet Sioux Falls Online 🖵 View Release	United States	Broadcast Media	Media & Information	129 <sup>[1]</sup> visitors/month
	NEWSNet San Antonio Online 🖵 View Release	United States	Broadcast Media	Media & Information	129 <sup>[1]</sup> visitors/month
	NEWSNet Salt Lake City Online  View Release	United States	Broadcast Media	Media & Information	129 <sup>[1]</sup> visitors/month
	NEWSNet Sacremento Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	129 <sup>[1]</sup> visitors/month
	NEWSNet Quincy Online The View Release	United States	Broadcast Media	Media & Information	129 <sup>[1]</sup> visitors/month
	NEWSNet Odessa Online 🖵 View Release	United States	Broadcast Media	Media & Information	129 <sup>[1]</sup> visitors/month
	NEWSnet Myrtle Beach Online The View Release	United States	Broadcast Media	Media & Information	129 <sup>[1]</sup> visitors/month
NEWSnet Miami	NEWSnet Miami Online 🖵 View Release	United States	Broadcast Media	Media & Information	129 <sup>[1]</sup> visitors/month
	East Hanover Florham Park Life Online  Uiew Release	United States	Print Media	Media & Information	124 <sup>[1]</sup> visitors/month
	NEWSnet Las Vegas Online 🖵 View Release	United States	Broadcast Media	Media & Information	123 <sup>[1]</sup> visitors/month
	NEWSnet Hawaii Online 🖵 View Release	United States	Online News Sites & Other Influencers	Media & Information	123 <sup>[1]</sup> visitors/month
tactics	Tactics Magazine for Shopping Centers Online  View Release	Canada	Trade Publications	Retail & Consumer	122 <sup>[1]</sup> visitors/month

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tactics	Tactics Magazine for Shopping Centers Online  View Release	Canada	Trade Publications	Retail & Consumer	122 <sup>[1]</sup> visitors/month
	NEWSnet Fresno Online 🖵 View Release	United States	Broadcast Media	Media & Information	114 <sup>[1]</sup> visitors/month
	TeleNews Online ☐ View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	111 <sup>[1]</sup> visitors/month
SHOW-Continental.com	Show Continental Online 🖵 View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	111 <sup>[1]</sup> visitors/month
Ch CHICANOL THE STREET LIP	ChicaNOL Online 🖵 View Release	United States	Blog	Multicultural & Demographic	103 <sup>[1]</sup> visitors/month
<b>FACE</b> MAGAZINE	FACE Magazine Online 🖵 View Release	United States	Newspaper	Media & Information	103 <sup>[1]</sup> visitors/month
Business Class News	Business Class News Online 🖵 View Release	United States	Blog	Media & Information	102 <sup>[1]</sup> visitors/month
KDAM-FM 94.3	KDAM-FM 94.3 Online 🖵 View Release	United States	Broadcast Media	Media & Information	95 <sup>[1]</sup> visitors/month
indicanews indiplotenties processed	indica News [San Ramon, CA] Online 🖵 View Release	United States	Online News Sites & Other Influencers	Media & Information	91 <sup>[1]</sup> visitors/month
KQRQ-FM 92.3	KQRQ-FM 92.3 Online 및 View Release	United States	Broadcast Media	Media & Information	91 <sup>[1]</sup> visitors/month
	Newsradio KOTA [Rapid City, SD] Online 🖵 View Release	United States	Broadcast Media	Media & Information	91 <sup>[1]</sup> visitors/month
	NEWSnet Columbia Online 🖵 View Release	United States	Broadcast Media	Media & Information	87 <sup>[1]</sup> visitors/month
	Boreal Community Media Online  View Release	United States	Newspaper	Media & Information	78 <sup>[1]</sup> visitors/month
	NEWSNet Orlando Online 🖵 View Release	United States	Broadcast Media	Media & Information	75 <sup>[1]</sup> visitors/month
SPORTS - TALK	WFOM 106.3 FM / 1230 AM [Atlanta, GA] Online Diversion View Release	United States	Broadcast Media	Media & Information	71 <sup>[1]</sup> visitors/month
PANORAMA GLOBAL con Geovarry Vicente Romero	Geovanny Vicente Romero Online 🖵 View Release	United States	Blog	Multicultural & Demographic	71 <sup>[1]</sup> visitors/month
PANORAMA GLOBAL con Geovarry Viconte Romero	Geovanny Vicente Romero Online 🖵 View Release	United States	Blog	Multicultural & Demographic	71 <sup>[1]</sup> visitors/month
My Utah News, Salt Lake City, Utah	My Utah News, Salt Lake City, Utah Online 🖵 View Release	United States	Newspaper	Media & Information	66 <sup>[1]</sup> visitors/month
COUNTRY LACE ADDS	WMPW 105.9 FM [Danville, VA] Online	United States	Broadcast Media	Media & Information	61 <sup>[1]</sup> visitors/month

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				<b>U</b>	
newstalk 97.1-105.9 fm	NewsTalk 97.1-FM / WSMY 1080-AM [Weldon, NC] Online  View Release	United States	Broadcast Media	Media & Information	60 <sup>[1]</sup> visitors/month
TAST.	Thrills Taste Travels Online 🖵 View Release	United States	Blog	Travel & Leisure	58 <sup>[1]</sup> visitors/month
NEWSNet Waco	NEWSNet Waco Online TView Release	United States	Broadcast Media	Media & Information	54 <sup>[1]</sup> visitors/month
	NEWSnet Nashville Online  View Release	United States	Broadcast Media	Media & Information	50 <sup>[1]</sup> visitors/month
	NEWSnet Monterey Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	50 <sup>[1]</sup> visitors/month
	NEWSnet Minneapolis Online  View Release	United States	Broadcast Media	Media & Information	50 <sup>[1]</sup> visitors/month
	NEWSNet Tampa Online 🖵 View Release	United States	Broadcast Media	Media & Information	43 <sup>[1]</sup> visitors/month
	WWZW-FM Classic story96.7 [Lexington, VA] Online  View Release	United States	Broadcast Media	Media & Information	29 <sup>[1]</sup> visitors/month
Oregon Family	Oregon Family Online  View Release	United States	Print Media	Media & Information	23 <sup>[1]</sup> visitors/month
SW Connection Newspapers, Eden Prairie, Minnesota	SW Connection Newspapers, Eden Prairie, Minnesota Online _ View Release	United States	Newspaper	Media & Information	Not Available
Meeting News Northwest, Oregon	Meeting News Northwest, Oregon Online  View Release	United States	Newspaper	Media & Information	Not Available
Essential Magazines, Boca Raton, Florida	Essential Magazines, Boca Raton, Florida Online 🖵 View Release	United States	Newspaper	Media & Information	Not Available
Discover Our Coast, Astoria, Oregon	Discover Our Coast, Astoria, Oregon Online 🖵 View Release	United States	Newspaper	Media & Information	Not Available
City News Phoenix, Phoenix AZ	City News Phoenix, Phoenix AZ Online  View Release	United States	Newspaper	Media & Information	Not Available
Jepen Qaily Hews "Pyre dur tweet kyrited dwr tae kyrgyne"	Aspen Daily News [Aspen, CO] Online 🖵 View Release	United States	Newspaper	Media & Information	Not Available
. SUPER LATINA P	SuperLatina TV Online 🖵 View Release	United States	Blog	Multicultural & Demographic	Not Available
Parísh News	Parish News [New Orleans, LA] Online _ View Release	United States	Newspaper	Media & Information	Not Available
	Today's Family Magazine Online 🖵 View Release	United States	Print Media	Media & Information	Not Available
	The Palmetto Network Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	Not Available

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	San Clemente Journal Online 🖵 View Release	United States	Print Media	Media & Information	Not Available
	Pooler Magazine Online 🖵 View Release	United States	Print Media	Media & Information	Not Available
	Newark Life Magazine Online 🖵 View Release	United States	Print Media	Media & Information	Not Available
	Effingham Magazine Online 🖵 View Release	United States	Print Media	Media & Information	Not Available
MUJERES	Revista MUJERES Internacional Online 🖵 View Release	United States	Magazine	Multicultural & Demographic	Not Available

Similarweb [2] Alexa, [3] siteworthtraffic.com [4] Cision Digital Reach

\*Data sources: [1]

\*The data cited here by SimilarWeb represents site traffic data of worldwide unique visitors on desktop and mobile devices. Data is updated monthly.

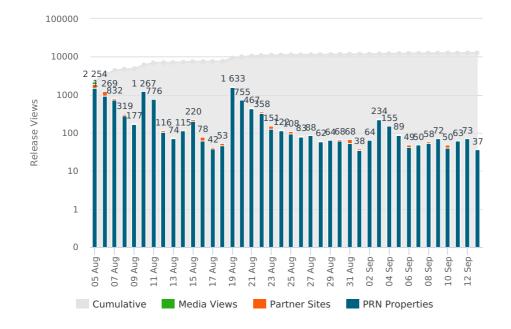
#### Traffic

# Overview

RELEASE VIEWS & HITS	16.9K	MULTIMEDIA
Release Views	16.5K	
Media Views	293	
Public Views	16.2K	
Partner Sites	<b>2</b> K	
PR Newswire Properties	14.2K	
Release Web Crawler Hits	336	

#### **Release Views**

#### Release Views Over Time

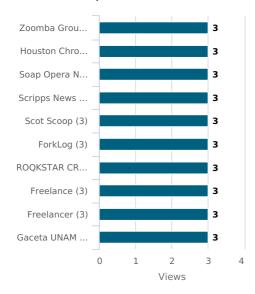


Media Views on PR Newswire for Journalists

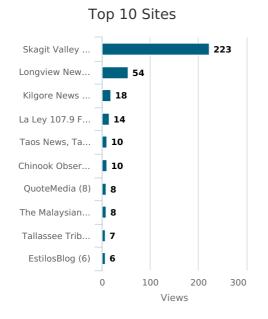
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Top 10 Outlets



#### Views on Partner Sites



#### Traffic to PR Newswire Properties

#### Type of Views



#### Views

Total Views on PR Newswire Properties	14,214
Mobile/Tablet Views	6,576
Desktop Views	7,638
Туре	Views

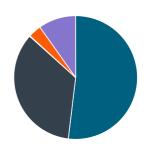
Desktop Views Mobile/Tablet Views

2	
ktop Views	
ile/Tablet Views	

#### **External Traffic Sources**

Understand how viewers found your release.

Source Type	Source	Instances
Direct		7,383
Direct	Direct	7,383
✓ Search Engine (6)		4,939
Search Engine	Google	4,689
Search Engine	DuckDuckGo	131
Search Engine	Bing	70
Search Engine	Yahoo!	47
Search Engine	Sogou	1
Search Engine	DogPile	1
∽ Social Media (2)		22
Social Media	X	16
Social Media	Facebook	6
~ PR Newswire Properties (1)		484
PR Newswire Properties	prnewswire.com	484
<ul> <li>Other Sites (70)</li> </ul>		1,395
Other Sites	amp.sacbee.com	671
Other Sites	amp-sacbee-com.cdn.ampproject.org	177
Other Sites	msn.com	142
Other Sites	sacbee.com	121
Other Sites	mtbnj.com	75
Other Sites	search.brave.com	23
Other Sites	fox4kc.com	23
Other Sites	wfla.com	18
Other Sites	ktsm.com	10
Other Sites	kron4.com	10
Other Sites	fox2now.com	9
Other Sites	smartnews.com	7
Other Sites	fox40.com	6
Other Sites	nbc4i.com	5
Other Sites	l.instagram.com	5
Other Sites	finance.yahoo.com	5
Other Sites	ecosia.org	5
Other Sites	fox8.com	4
Other Sites	fox4kc-com.cdn.ampproject.org	4
Other Sites	wane.com	4
Other Sites	mytwintiers.com	3
Other Sites	wrbl.com	3
Other Sites	fox5sandiego.com	3
Total		14,223



Direct
Search Engine
Social Media
PR Newswire Properties
Other Sites

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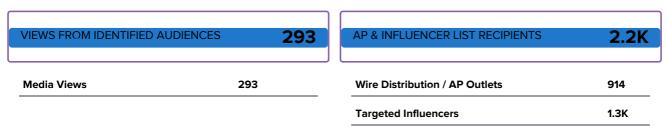
Source Type	Source	Instances
Other Sites	wins.com	3
Other Sites	wtnh.com	3
Other Sites	kansascity.com	2
Other Sites	statics.teams.cdn.office.net	2
Other Sites	yahoo.com	2
Other Sites	miamiherald.com	2
Other Sites	news10.com	2
Other Sites	wtrf.com	2
Other Sites	url-opener.com	2
Other Sites	fox40-com.cdn.ampproject.org	2
Other Sites	fox59.com	2
Other Sites	mystateline.com	2
Other Sites	wavy.com	2
Other Sites	dnserrorassist.att.net	1
Other Sites	wvnstv.com	1
Other Sites	wboy-com.cdn.ampproject.org	1
Other Sites	kron4-com.cdn.ampproject.org	1
Other Sites	sms.localhost	1
Other Sites	amp.thenewstribune.com	1
Other Sites	bellinghamherald.com	1
Other Sites	charlotteobserver.com	1
Other Sites	yourcentralvalley.com	1
Other Sites	idahostatesman.com	1
Other Sites	contribute.flowminr.com	1
Other Sites	fox16.com	1
Other Sites	perplexity.ai	1
Other Sites	links.streem.com.au	1
Other Sites	thestate.com	1
Other Sites	newsobserver.com	1
Other Sites	nxsttv.com	1
Other Sites	web.telegram.org	1
Other Sites	aol.com	1
Other Sites	bradenton.com	1
Other Sites	wane-com.cdn.ampproject.org	1
Other Sites	nwahomepage.com	1
Other Sites	ksn.com	1
Other Sites	wwlp.com	1
Other Sites	da6-tex-px.txt.textron.com	1
Other Sites		1
Other Sites	inoreader.com	1
Total		14,223

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Other Sites localsyr.com	1
Other Sites kansas.com	1
Other Sites wtaj.com	1
Other Sites wkrg.com	1
Other Sites ksn-com.cdn.ampproject.org	1
Other Sites abc27.com	1
Other Sites myfox8.com	1
Total	14,223

#### Audience

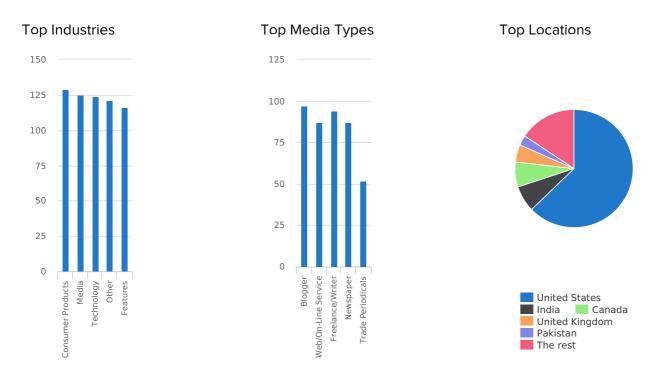
# Overview



#### **Audience Summary**

#### Media Demographics

A break down of the industries covered, the media types and the locations of the journalists & bloggers accessing your releases on PR Newswire for Journalists.

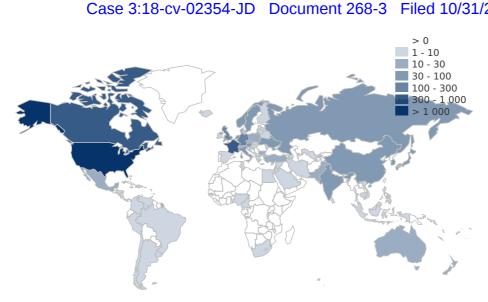


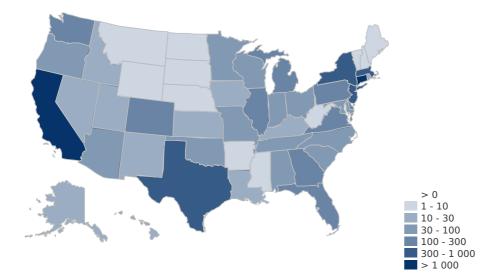
#### **Geo-segmentation**

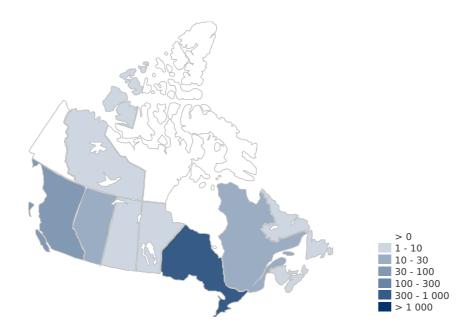
See where views of your release originated. Hover over map to see totals by location.

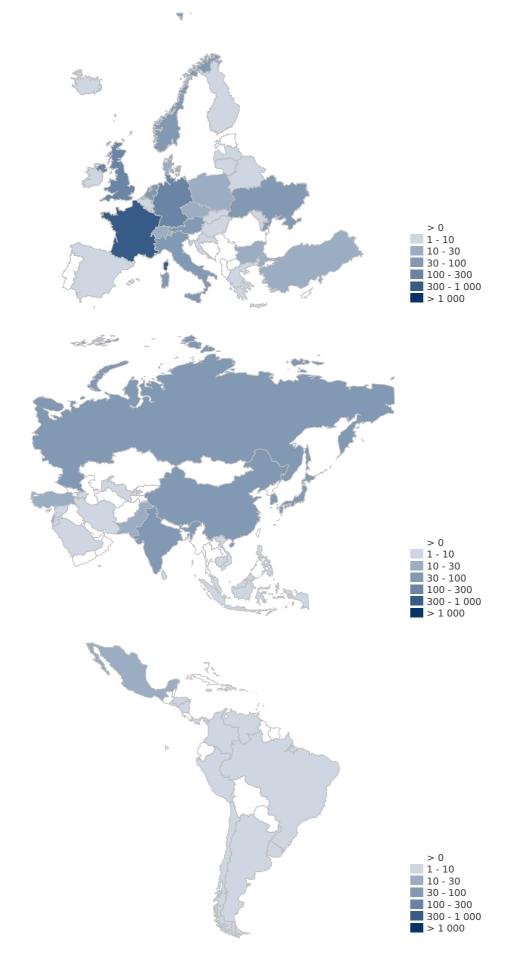
Select a	
region:	
World View	•

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**Audience Details** 

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#### Media Views

See the details of each media outlet from PR Newswire for Journalists that viewed your release.

				Merry
Outlet	Industry	Source Type	Location	Views
Zoomba Group	Other	Trade Periodicals	United States	3
Houston Chronicle	Features	Newspaper	United States	3
Soap Opera Network / ErrolLewis.com	Broadcast, Entertainment, Features, Media, Technology, Travel	Blogger, Freelance/Writer, Other, Television	United States	3
Scripps News Network	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Television, Web/On-Line Service	United States	3
Scot Scoop	Features	Newspaper	United States	3
ForkLog	Media, Technology	Freelance/Writer, Newspaper	Russia	3
ROQKSTAR CREW MEDIA	Broadcast, Media	Radio	United States	3
Freelance	Features	Freelance/Writer	Canada	3
Freelancer	Entertainment, Features, Healthcare	Freelance/Writer, Newspaper	United States	3
Gaceta UNAM	Environment, Features, Healthcare, Media, Public Issues, Sports, Travel	Newspaper, Web/On-Line Service	Mexico	3
GHEP, Rock and Art Culture magazine, Roots Music	Energy, Environment, Features, Healthcare, Media, Public Issues, Technology	Freelance/Writer, Newspaper, Other	Canada	3
heart & soul	Entertainment, Healthcare, Travel	Consumer Periodicals, Radio, Web/On-Line Service	United States	3
Randall-Reilly Publishing Co.	Transportation	Trade Periodicals	United States	3
HomePage News	Consumer Products, Features	Trade Periodicals	United States	3
PR	Technology	Other	Malaysia	3
Spiltmilk.mom	Auto, Broadcast, Entertainment, General Business, Healthcare, Media, Other, Public Issues, Technology, Travel	Blogger, Freelance/Writer, Radio	United States	3
Pongan el Café	Broadcast, Consumer Products, Entertainment, Media, Technology, Travel	Blogger	United States	3
Jacksonville Journal-Courier	Auto, Consumer Products, Energy, Entertainment, Environment, Features, General Business, Healthcare, Media, Other, Public Issues, Technology, Transportation	Newspaper	United States	3
Path to Purchase IQ and Retail Leader	Consumer Products, Other	Trade Periodicals	United States	3
Accion Labs	Auto, Entertainment, Environment	Blogger, Radio	Greece	3
Legal Support World	Other	Blogger, Freelance/Writer	United States	3
Life a la Latina	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Blogger	United States	3
Los Angeles Daily Journal/Southern California News Group	Broadcast, Entertainment, Healthcare, Other, Public Issues, Transportation, Travel	Freelance/Writer, Newspaper, Other	United States	3
Okinawa Marine	Broadcast, Environment, Features, Financial Services, Media, Public Issues, Technology, Transportation, Travel	Freelance/Writer, Newspaper, Web/On-Line Service, Wire Service	Japan	3
Noel Burgess LLC	Entertainment, Features, Media, Public Issues, Sports, Technology, Travel	Freelance/Writer	United States	3
Nawae Pakistan	Public Issues	Web/On-Line Service	Pakistan	3
Total				293

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Outlet	Industry	Source Type	Location	Views
Next Dimension Story	Other	Other	United Kingdom	3
New York 1 News	Other	Television	United States	3
speniz	Auto	Blogger	United States	3
FoodBev Media	Consumer Products	Freelance/Writer	United Kingdom	3
Economic Review	Auto, Energy, Features, Financial Services, Media, Public Issues, Sports	Freelance/Writer, Newspaper, Trade Periodicals	Pakistan	3
Times of News 24x7	Healthcare	Blogger, Other, Web/On-Line Service	India	3
Young Voices	Consumer Products, Healthcare, Public Issues	Newspaper	United States	3
WJET/WFXP/Nexstar Broadcasting	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Financial Services, General Business, Healthcare, Media, Public Issues, Sports, Technology, Transportation, Travel	Blogger, Newspaper, Television	United States	3
AtmosEsp	Entertainment, Media	Other	United States	3
CBC	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Radio	Canada	3
CHANTELLEW	Financial Services, General Business, Public Issues	Blogger	Monaco	3
TrendZine!	Consumer Products, Environment, General Business, Other	Web/On-Line Service	United States	3
STEWAWEL News & Information	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Radio, Television, Web/On-Line Service, Wire Service	United States	3
cision	Auto	Blogger	United States	3
Cision (PR Newswire)	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Blogger, Consumer Periodicals, Freelance/Writer, Newspaper, Other, Radio, Television, Trade Periodicals, Web/On-Line Service, Wire Service	United States	3
Cognizant	Auto, General Business, Technology	Blogger, Freelance/Writer	India	3
Cision	Academe, Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Multicultural, Other, Public Issues, Sports, Technology, Transportation, Travel	Blogger, Newspaper, Television	India	3
The Weekly Issue/El Semanario	Auto, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Media, Public Issues, Sports, Technology, Transportation, Travel	Newspaper	United States	3
Daily News	Other	Other	South Africa	3
Design World	Technology	Freelance/Writer, Trade Periodicals	United States	3
Delion	Environment, Financial Services, General Business, Other, Technology	Blogger, Newspaper	Canada	3
News Aktuell	Other	Wire Service	Switzerland	3
Cutter Consortium, Data Analytics & Digital Technologies Advisor	Financial Services, Healthcare, Technology	Blogger, Freelance/Writer, Trade Periodicals, Web/On-Line Service	United States	3
The Reel Media Group, LLC	Consumer Products, General Business, Media	Blogger, Other, Web/On-Line Service	United States	3
Too de Media				2
Trade Media	Consumer Products, Other	Trade Periodicals, Web/On-Line Service	Romania	2
Viable.Earth	Consumer Products, Other Auto, Consumer Products, Energy, Environment		Romania Vietnam	2

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the Grid Culturethose Dordbacks, Classaner Products, Ensert, Farentinement, Berner, B	Outlet	Industry	Source Type	Location	View
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Index	WSAZ	Financial Services	Television		
Index	The Hangry Woman	Consumer Products, Travel	Blogger, Freelance/Writer		
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Technology       States         NewsRise       Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel       Freelance/Writer, Newspaper, Radio, Walaysia       Malaysia	Pharmaceutical Technology	Other	Other		
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Total 29	NewsRise	Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports,		Malaysia	
	Total	1	1		29

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Environment, Featur Healthcare, Heavy In Technology, TransporFast Food ReviewConsumer Products,EtarowritesFinancial Services, CEL PAISConsumer Products, General Business, MDotdash MeredithConsumer Products, Other, Technology, TDoc Lawrence ProductionsBroadcast, Consumer General Business, MDiemel CommunicationsFeatures, General Business, MDaily evening NewspaperPublic IssuesCookingChew.com / Ralph's MediaConsumer Products, TransportationChemical ProcessingEnergy, Entertainment Business, Healthcare, TransportationNEWSDESK USAAuto, Broadcast, Consumer Products, Consumer, Featur	Entertainment General Business, Other, Technology	Source Type Web/On-Line Service Blogger, Freelance/Writer, Newspaper	Location India United	Viev
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Technology, Travel         Daily evening Newspaper       Public Issues         CookingChew.com / Ralph's Media       Consumer Products,         Community Impact       Energy, Entertainmen Business, Healthcard Transportation         Chemical Processing       Energy, Environmen Technology         NEWSDESK USA       Broadcast, Media, Pu Cert Center Canada	er Products, Entertainment, Features, edia, Sports, Travel	Blogger, Freelance/Writer, Newspaper	United States	
CookingChew.com / Ralph's Media       Consumer Products,         Community Impact       Energy, Entertainmengusiness, Healthcarn Transportation         Chemical Processing       Energy, Environment Technology         NEWSDESK USA       Broadcast, Media, Products, Media, Products, Media, Processing         Cert Center Canada       Auto, Broadcast, Consumer, Feature Healthcare, Heavy Internation	usiness, Healthcare, Public Issues,	Freelance/Writer	United States	
Community Impact Energy, Entertainme Business, Healthcard Transportation Energy, Environmen Technology NEWSDESK USA Broadcast, Media, Pr Cert Center Canada Auto, Broadcast, Co Environment, Featur Healthcare, Heavy In		Newspaper	Pakistan	
Business, Healthcarr       Transportation       Chemical Processing     Energy, Environmen Technology       NEWSDESK USA     Broadcast, Media, Processing       Cert Center Canada     Auto, Broadcast, Co Environment, Featur Healthcare, Heavy In	Features, General Business, Media, Other	Blogger	United States	
Technology NEWSDESK USA Broadcast, Media, Pr Cert Center Canada Auto, Broadcast, Co Environment, Featur Healthcare, Heavy In	ent, Environment, Features, General e, Media, Public Issues, Technology,	Newspaper	United States	
Cert Center Canada Auto, Broadcast, Co Environment, Featur Healthcare, Heavy In	t, General Business, Heavy Industry,	Trade Periodicals	United States	
Environment, Featur Healthcare, Heavy In	ublic Issues	Web/On-Line Service, Wire Service	United States	
	nsumer Products, Energy, Entertainment, res, Financial Services, General Business, ndustry, Media, Other, Public Issues, Sports, ntation, Travel	Blogger, Consumer Periodicals, Freelance/Writer, Newspaper, Other, Radio, Television, Trade Periodicals, Web/On-Line Service, Wire Service	Canada	
	ertainment, Features, General Business, lia, Public Issues, Technology, el	Blogger, Consumer Periodicals, Freelance/Writer, Newspaper, Radio, Television, Web/On-Line Service	Canada	
Bloomberg News Other		Wire Service	Netherlands	
BeingCarried Media LLC Consumer Products,	Financial Services, Healthcare, Other	Blogger	United States	
Bagable Media Consumer Products,	Entertainment, General Business, Travel	Blogger, Freelance/Writer, Web/On- Line Service	United States	
	er Products, Entertainment, Features, Media, Sports, Technology, Transportation, Travel	Other	United States	
	er Products, Entertainment, Environment, Services, Healthcare, Media, Other, Public	Blogger, Freelance/Writer, Other, Web/On-Line Service	Syria	
Advantage Business Media Other		Consumer Periodicals	United States	
Adams Editorial Services Consumer Products, Other, Technology	Environment, Healthcare, Heavy Industry,	Freelance/Writer, Trade Periodicals	United States	
Feather River Bulletin Other		Newspaper	United States	
Food Dive Consumer Products		Trade Periodicals	United States	
Food Service Equipment Reports Consumer Products		Freelance/Writer, Trade Periodicals	United States	
FoodBev Media Consumer Products		Trade Periodicals	United	
NBCUniversal Consumer Products,			Kingdom	
Total	Media	Television, Web/On-Line Service	Kingdom United States	

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Outlet	Industry	Source Type	Location	Views
Nation's Restaurant News	Features, General Business, Other	Trade Periodicals, Web/On-Line Service	United States	2
naradnewsusa.com	Auto, Consumer Products, Entertainment, Features, Financial Services, Healthcare, Media, Public Issues, Sports, Technology, Travel		India	2
Naptown Buzz LLC	Auto, Consumer Products, Entertainment, Environment, Features, General Business, Healthcare, Media, Other, Public Issues, Sports, Technology, Travel	Blogger, Consumer Periodicals, Web/On-Line Service	United States	2
mmirandalaurenn	Consumer Products, Entertainment, Media, Other	Blogger	United States	2
Megan Poinski	Consumer Products	Freelance/Writer	United States	2
KrazzyMag	Auto, Entertainment, Financial Services, Healthcare, Media, Sports, Technology, Travel	Blogger, Other, Web/On-Line Service	India	2
Kingsport Times-New	Other	Newspaper	United States	2
ITWeek	Auto, Entertainment, Financial Services, Technology	Web/On-Line Service	Turkey	2
Inside Retail US Auto, Consumer Products, Features, General Business, Web/On-Line Service Healthcare, Other, Technology, Travel				2
Industry Dive	Consumer Products, Energy, Environment, Features, Financial Services, General Business, Public Issues, Technology	Web/On-Line Service	United States	2
Humari Baat	Consumer Products, Environment, Features, Financial Services, General Business, Other, Public Issues, Sports, Technology, Travel		India	2
HomeArtsContentandCopywriting.com	Consumer Products, Environment, Features, Other, Travel	Other	United States	2
hispanic pr blog	Media Freelance/Writer		United States	2
GKM MEDIA PRODUTION INC.	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Blogger, Newspaper, Radio, Television, Web/On-Line Service	Canada	2
Freelancer	Other	Trade Periodicals	United States	2
Freelance	Environment, Features, Healthcare, Other, Technology	Freelance/Writer	Germany	2
FoodTechBiz	Consumer Products, Other, Technology	Web/On-Line Service	India	2
Latin Times	Other	Newspaper	United States	2
KCPQ (Q13)	Auto, Broadcast, Consumer Products, Energy, Entertainment,TelevisionEnvironment, Features, Financial Services, General Business,Healthcare, Heavy Industry, Media, Other, Public Issues, Sports,Technology, Transportation, Travel		United States	1
Puget Sound Business Journal	General Business	Newspaper, Web/On-Line Service	United States	1
Voice of America	Media	Web/On-Line Service	United States	1
Total		1		293

#### **Targeted Audience**

The lists below represent categories of targeted audiences you selected for your release.

#### **Cision Influencer Lists**

Food (English) (118 organizations, 133 recipients)

Organization	Number of recipients
Remezcla	4

#### Case 3:18-cv-02354-JD Document 268-3 Filed 10/31/24 Page 98 of 109

Organization	Number of recipients
	•
LATINA Style	3
NBC News Latino	3
PlanetM	3
El Vistazo	2
Fusion	2
Hispanic Engineer & amp; Information Technology	2
Hispanic Network Magazine	2
Latino Foodie	2
Nuestro Tiempo Magazine	2

#### Food (Spanish) (626 organizations, 1,187 recipients)

Organization	Number of recipients
Freelancer	72
Univisión Network	41
Univisión 34 Los Ángeles	20
Influencer	18
Telemundo 52	12
Univisión 23 Dallas	12
CNN en Español	11
Univisión Arizona	10
Univisión Chicago	10
WJAN LD Ch. 41 América TeVe	10

#### Associated Press Outlets

PR Newswire's wire newslines include targeted distribution to the Associated Press, an essential global news network that delivers content to an extensive set of media platforms and formats. The list below represents the outlets you reach via this partnership.

Outlet Name	City	State	Location	Туре	Audience
C-SPAN	Washington	DC	US	Television	86,200,000 Subscribers
Scribd, Inc.	San Francisco	CA	US	Aggregator	43,531,670 Visitors per Month
FoxNews.com	New York	NY	US	Online	32,516,438 Visitors per Month
CBS News Radio	New York	NY	US	Radio	30,000,000 Broadcast Audience
New York Times Digital	New York	NY	US	Newspaper	29,886,442 Visitors per Month
Apple Inc.	Cupertino	CA	US	Organization/Company	29,709,459 Visitors per Month
CNBC.com	Englewood Cliffs	NJ	US	Online	26,089,260 Visitors per Month
CBSnews.com	New York	NY	US	Online	26,080,671 Visitors per Month
abcnews.com	New York	NY	US	Online	24,167,779 Visitors per Month
U.S. News & World Report	Washington	DC	US	Magazine	23,945,529 Visitors per Month

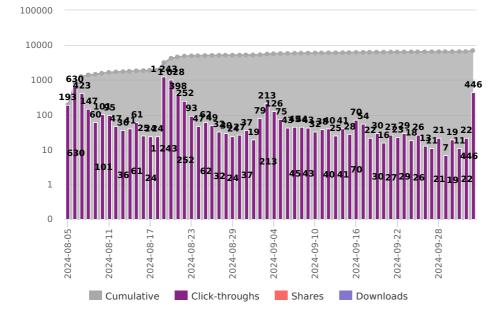
#### Engagement

#### Overview

TOTAL ENGAGEMENT ACTIONS	7.5K
Click-throughs	7.5K
Shares	1

#### **Engagement Timeline**

See when your audience engaged with your release.



# **Engagement Details**

A break down of click-throughs, shares and other engagement actions.

#### Click-throughs

The number of times your releases sent visitors to the pages you linked to.

URL	Click- throughs
https://www.barsclassaction.com/?utm_source=PRN	3,901
https://www.barsclassaction.com/?utm_source=PRN&utm_medium=Submit_A_Claim&utm_campaign=Clif	2,905
$https://www.barsclassaction.com/?utm\_source=PRN\&utm\_medium=Exclude\&utm\_campaign=Clifformediamediamediamediamediamediamediamedia$	243
https://www.barsclassaction.com/?utm_source=PRN&utm_medium=More_Info&utm_campaign=Clif	145
https://www.barsclassaction.com/?utm_source=PRN&utm_medium=Motion&utm_campaign=Clif	95
https://www.barsclassaction.com/?utm_source=PRN&utm_medium=Instructions&utm_campaign=Clif	75
https://www.barsclassaction.com/?utm_source=PRN&utm_medium=Object&utm_campaign=Clif	47
Total	7,490

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URL	Click- throughs
https://www.barsclassaction.com/?utm_source=PRN_Spa_Spa&utm_medium=Submit_A_Claim&utm_campaign =Clif	14
$https://www.barsclassaction.com/?utm\_source=PRN\_Spa&utm\_medium=More\_Info&utm\_campaign=Clifowed_space{2.5}{\linescharge} and the state of the state$	14
$https://www.barsclassaction.com/?utm\_source=PRN\_Spa&utm\_medium=Exclude&utm\_campaign=Clifformediamediamediamediamediamediamediamedia$	13
$https://www.barsclassaction.com/?utm\_source=PRN\_Spa&utm\_medium=Instructions&utm\_campaign=Clifform and the source and the sou$	13
https://www.barsclassaction.com/?utm_source=PRN_Spa&utm_medium=Object&utm_campaign=Clif	12
https://www.barsclassaction.com/?utm_source=PRN_Spa&utm_medium=Motion&utm_campaign=Clif	11
https://www.barsclassaction.com/?utm_source=PRN_Spa	2
Total	7,490

#### Shares

A break down of the types of sharing your releases generated.

Type of share	Shares
Webmail	1
Total Shares	1

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EAG Gulf Coast, LLC

# Exhibit I: California Consumer Legal Remedies Act ("CLRA")

#### **NEWS**

# Five charged in death of 'Friends' star Perry

KiMi Robinson, Taijuan Moorman and Jay Stahl USA TODAY

Five people have been charged in connection to "Friends" star Matthew Perry's death from "the acute effects of ketamine" last October.

During a Thursday news conference, Martin Estrada, the U.S. attorney for the Central District of California, announced a shocking "number of charges against the five defendants," including a doctor, 42-year-old Salvador Plasencia, and Perry's live-in assistant Kenneth Iwamasa, 59.

"The defendants in this case knew what they were doing was wrong," Estrada said.

"It is a drug that must be administered by medical professionals, and the patient must be monitored closely. That did not occur here," Estrada added during the conference, saying that after Perry's death, "these defendants tried to cover up what they did."

Estrada issued a warning for those who are engaging with similar actions as the allegations leveled: "You are playing roulette with other people's lives, just like these five defendants here did to Mr. Perry."

The lead defendants in the case are Plasencia and Jasveen Sangha, 41, known as "The Ketamine Queen" of North Hollywood, as well as an additional trio of co-conspirators including Iwamasa, Eric Fleming, 54, and another doctor, Mark Chavez, 54.

According to a Department of Justice news release, in September, Plasencia learned that Perry was interested in getting ketamine.

In November 2022, nearly a year earlier, Perry released his memoir "Friends, Lovers, and the Big Terrible Thing," a book that traced his origins with fame and an honest account of his highly publicized battle with alcoholism and drug addiction. His struggle with substances spanned decades.

Later, Plasencia contacted Chavez, who used to operate a ketamine clinic, to obtain the anesthetic drug with the pur-



Actor Matthew Perry arrives at the Comedy Awards 2012 in New York Cityon April 28, 2012. LEE CELANO/REUTERS

pose to sell to Perry. According to investigators, Plasencia sent a text messages to Chavez that included, "I wonder how much this moron will pay" and "Lets find out."

# Investigators detail the alleged actions that led to Perry's death

In a news release and a news conference Thursday, investigators laid out the moments that led to Perry's October death at his Los Angeles home.

They say that on Oct. 28, 2023, the day that Perry died, his live-in assistant Iwamasa injected Perry with ketamine, as he did several times before, without proper medical licensure to complete the injections.

The ketamine used in Perry's death was done with instructions and syringes provided by Plasencia with ketamine sold by Fleming and Sangha, officials allege.

Plasencia allegedly sold the drug to Iwamasa although he was informed at least one week prior to Perry's death that his addiction to ketamine was "spiraling out of control." Later, Sangha texted Fleming to "delete all our messages." Later, the Los Angeles Police Department executed a search warrant at Sangha's "stash house" and say they found evidence of drug trafficking, including approximately 79 vials of ketamine as well as several other drugs.

In May, the LAPD confirmed a joint investigation in an emailed statement to USA TODAY.

# **Columbia president resigns after her handling of protests**

Zachary Schermele

Minouche Shafik, the president of Columbia University in New York City, resigned on Wednesday after her handling of pro-Palestinian protests on campus earlier this year turned the school into a flashpoint of nationwide debates over the Israel-Hamas war.

The dramatic turn of events makes her the latest Ivy League school president to step down since domestic controversies over the conflict began roiling college campuses, particularly at schools in major urban areas. Many of those demonstrations were inspired by the events at the Manhattan school last semester.

"This period has taken a considerable toll on my family, as it has for others in our community," she wrote in an email to students and faculty Wednesday evening. "Over the summer, I have been able to reflect and have decided that my moving on at this point would best enable Columbia to traverse the challenges ahead."

A former official at the World Bank, Shafik said Wednesday the United Kingdom's foreign secretary asked her to serve in a high-ranking government role, and she will return to England.

Like the now-former presidents of Harvard and the University of Pennsylvania, Shafik's testimony before Congress in April put her in a precarious position. Harvard's Claudine Gay, who stepped down in January, was just six months into the gig. The University of Pennsylvania's Liz Magill was president for just over a year and resigned mere days after Republicans summoned her and Gay to Washington last December.

As the spring semester neared a close, Shafik's attempt to assuage bipartisan concerns about antisemitism only inflamed the situation at the school. Anti-Zionist protesters occupied the campus lawns in droves in the



Columbia University President Minouche Shafik at a House Education and the Workforce Committee in April. JACK GRUBER/USA TODAY NETWORK

wake of her testimony, demanding the university sever all ties with the state of Israel. Shafik said the demonstrators were violating university policies and posing a "clear and present danger." She called in the New York City Police Department, and officers arrested more than 100 protesters

Later that month, when campus protesters took over an academic building, she called law enforcement back to campus. Days earlier she had indicated she had no plans to again call on the police to quell student dissent related to the conflict in the Middle East.

Katrina Armstrong, chief executive officer of Columbia University Irving Medical Center, has agreed to serve as interim president, according to an email from the board of trustees.

House Speaker Mike Johnson released a statement Wednesday, calling Shafik's resignation "long overdue."

"We hope that President Shafik's resignation serves as an example to university administrators across the country that tolerating or protecting antisemites is unacceptable and will have consequences," Johnson said in a statement. "Jewish students at Columbia beginning this school year should breathe a sigh of relief."

Contributing: Charles Ventura, USA TODAY

LEGAL NOTICE

#### If You Purchased Certain Clif Bar & Company Bars Since April 2014 You Could Receive a Cash Payment as Part of a Class Action Settlement.

What is the lawsuit about? The lawsuit contends that Clif Bar & Company ("Clif Bar") made certain statements on the labels of various original Clif Bars and Clif Kid ZBars ("Class Products") that are allegedly misleading because the statements suggested the bars are healthy, whereas Plaintiffs allege the bars are unhealthy because of their added sugar. Clif Bar maintains that these products are not unhealthy due to the presence of added sugars, and that the statements on its bars are true and not misleading. The Court has not determined whether Plaintiffs or Clif Bar is correct.

Russia sentences US citizen 12 years on treason charge

**Eric Lagatta** USA TODAY

Gershkovich, were released by the Kremlin as part of one of the most significant East-West prisoner exchanges since the Cold War. As part of the exchange, eight individuals held in the U.S., Germany, Norway, Slovenia and Poland were returned to Russia. Ever since Russia launched its devastating war with Ukraine, Moscow has ramped up efforts to detain Americans in hopes of using them in prisoner exchanges amid increased tensions between the United States and Russia. While Karelina was not included in the prisoner swap, her lawyer, Mikhail Mushailov, has said she hoped to be included in a future exchange. Reuters reported.

A Russian court sentenced a dual Russian American citizen to 12 years in prison Thursday for treason after finding her guilty of giving money to a group supporting Ukraine's armed forces, according to reports.

The funds that Ksenia Karelina, 33, donated – totaling little more than \$50 –



were "used to purchase tactical medicine, equipment, weapons and ammunition" for Ukraine, the court claimed.

Karelina

Though Karelina, who is from Yekaterinburg and lives in Los Angeles, pleaded guilty, the wom-

pleaded guilty, the woman and her supporters have insisted the money was sent to a charity supporting

money was sent to a charity supporting humanitarian efforts in the war-torn country that Russia invaded in 2022.

The sentencing came Thursday at a closed trial in Yekaterinburg in central Russia, where Karelina's case was heard by the same court that in July convicted Wall Street Journal reporter Evan Gershkovich of espionage.

# Karelina sentenced two weeks after major prisoner swap

Karelina, a spa worker and trained ballet dancer, appeared in court in a white sweatshirt and blue jeans, sitting calmly in a glass courtroom cage, Reuters reported.

Russia's Federal Security Service (FSB,) the country's main domestic intelligence agency, had accused Karelina of collecting funds for the Ukrainian army following her February arrest. Her family and other supports, however, said she donated \$51.80 to a charity raising money for humanitarian relief for Ukrainians impacted by the war.

The money went to Razom for Ukraine, a New York-based charity that provides aid to children and elderly people in the country. The charity has denied it provides any military support to Kyiv, Reuters reported.

Karelina's sentencing comes about two weeks after 16 prisoners, including

# Karelina arrested in January while visiting family in Russia

Karelina's arrest, announced on Feb. 20, came as a shock to her family and friends in the U.S., who said she was never interested in political activism, according to Reuters.

Born in Russia, Karelina emigrated to the United States in 2012 for a workstudy program to pursue dancing as a ballerina, according to the website www.freeksenia.com. She moved from Baltimore to Los Angeles in 2017 and worked at a spa in Beverly Hills before becoming an American citizen in 2021.

Karelina was arrested in January initially on hooliganism charges after flying to Russia to visit family in Yekaterinburg, including her 90-year-old grandmother, according to freeksenia-.com. While she was jailed for 15 days, FSB authorities interrogated Karelina and searched her cellphone to find a 2022 Venmo donation to Razom for Ukraine.

Just before Karelina was set to be released, she was charged with state treason. FSB announced the arrest the following month with a statement accusing Karelina, who the agency did not name, of "providing financial assistance to a foreign state in activities directed against the security of our country."

Contributing: Thao Nguyen, USA TODAY; Reuters Who is included? You are a Class Member if you bought one of the Class Products for household use, and not for resale or distribution, between April 2014 and March 2023 in California or New York, or between March 2019 and March 2023 in any other State. The Class Products include Original Clif Bars in packaging stating "Nutrition for Sustained Energy," and Clif Kid ZBars in packaging stating "No High Fructose Corn Syrup;" "Nourishing Kids in Motion;" "In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created Clif Kid – wholesome, delicious snacks made with organic ingredients to help keep kids going, growing, and exploring;" "Blend of carbs, fiber, protein, and fat gives kids energy so they can keep Zipping and Zooming along," and similar Challenged Claims (as identified in the Complaint in the Action).

What does the settlement provide? Clif Bar has agreed to establish a \$12,000,000 "Settlement Fund" to pay all Settlement expenses, including the costs of class notice and administration, attorneys' fees and costs, service awards for the Plaintiffs, and cash refunds for Class Members who make valid Claims. Your legal rights will be affected if you are a Class Member and do not exclude yourself.

#### What are your options?

**Submit A Claim:** To receive Settlement benefits, you must complete and submit a Claim Form. Claim Forms are available at the Settlement Website and can be submitted electronically or mailed to the Class Administrator. A Claim Form must be **submitted online or postmarked by November 25, 2024**.

**Opt-Out or Object:** If you opt-out or request exclusion, you will retain your rights to sue Clif Bar separately; however, you will not be eligible to receive any benefits. You must submit a Request for Exclusion, available at the Settlement Website. Request for Exclusions must be **postmarked on or before October 22, 2024**. Detailed instructions are available on the Settlement Website. You may also object to any part of this Settlement. Details about how to object are available at the Settlement Website. Objections must be mailed to the Class Administrator and **postmarked on or before October 22, 2024**.

**Do Nothing:** If you do nothing, you will not be eligible to receive any benefits and will be bound by the terms of the Settlement Agreement and Final Judgment.

Has the Court approved the Settlement? No. The Court has set a hearing for November 14, 2024, at 10:00 a.m. California time, to determine whether to approve the Settlement and what attorneys' fees, expenses, and service payments to award. Class Counsel will file a motion seeking an award of up to one-third of the Settlement Fund in fees, and reimbursement of case expenses totaling up to \$917,584.35, plus any expenses incurred after entry of the Preliminary Approval Order. Class Counsel will also seek on behalf of the Class Representatives Service Awards of \$5,000 each for Ralph Milan and Elizabeth Arnold. The Court will determine the amount of fees, expenses, and service awards that will be paid from the Settlement Fund.

After Class Counsel's motion for attorneys' fees, expenses, and service awards is filed on or before **September 9, 2024**, it will be posted on the Settlement Website and you will have an opportunity to review and comment on the motion via an objection.

You do not need to appear at the Final Approval Hearing but you may come at your own expense. The Court has appointed Fitzgerald Monroe Flynn PC as Class Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

This is only a summary of the key Settlement terms. A full copy of the Settlement Agreement is available at the Settlement Website or by calling (844) 537-1156.

# Week in review

Recapping the most important and talked about news this week from around the world – ICYMI

### **NEWS**

## 'Thousand-year' floods hit NE

Areas of Connecticut and New York cleaned up this week after torrential rain and floods inundated towns, swallowed homes and killed at least two people. Southwest Connecticut was hit by more than a foot of rain Saturday to Monday, and parts of Long Island got more than 10 inches. Dozens of people fled or were rescued from their homes. Said Brenda Bergeron, Connecticut's deputy commissioner of emergency management, "We are talking about rainfall in some areas in the 1,000-year level."

# **OPINION**

# Yes, Ukraine can win the war

The Ukrainian offensive into the Russian Kursk region demonstrates that after more than two years, Ukraine is still capable of winning the war. But President Vladimir Putin hasn't responded with military might to the largest invasion of Russia since World War II. The invasion has driven at least 200,000 Russians from their homes. Perhaps if Russian propaganda were removed, many people would even oppose the war and Putin – as they certainly did not expect what their leader called "the special military operation" would extend to their territory. – Oleksandr Musiienko, Opinion contributor

## **MONEY**

## Score one for home sellers

New real estate rules that took effect this week were expected to throw sellers and buyers for a loop. The changes come after a class-action lawsuit claimed the real estate industry's traditional 5% to 6% commission structure – split between the buyer's and seller's agents – was artificially inflating those commissions. A settlement in the case has ended that practice, and now sellers and buyers will have to negotiate their own agent commissions. "It's like a dam that's springing a leak," the Consumer Federation of America's Stephen Brobeck told USA TODAY. "I'm fairly confident that within five years, the industry will look quite different."



## IMAGE OF THE WEEK

#### Nature's wonders need no name

Call it a full moon, supermoon, blue moon or sturgeon moon, but it was out in all its glory Monday over Palm Desert, Calif., larger and brighter than usual because of the proximity of its orbit to Earth.

TAYA GRAY/ USA TODAY NETWORK

# LIFE

# Phil Donahue, icon of talk TV, dies at 88

Phil Donahue, whose "The Phil Donahue Show" changed daytime TV by drawing studio audiences into discussions of social issues, died Sunday at age 88. "The Phil Donahue Show" (later "Donahue") ran from 1967 to 1996 and led to a chorus of TV talk, including "The Oprah Winfrey Show," an eventual rival. "A talk show is a fundamentally democratic event," Donahue said in 1993. "It allows the people who really own the airwaves, the public, to stand up and actually use them. ... Nobody tells our audience what to say. This is the street corner."

# **SPORTS**

# **OSU players' helmets will do double duty**

If anyone needed a reminder of how money has changed college football, they're getting it at Oklahoma State. Now that college athletes can earn money off their name, image and likeness (known as NIL), this season the team will wear OR codes on their helmets that lead fans to a team donation page in hopes of spreading the wealth beyond the star players who are more likely to earn endorsement deals. So, as college football kicks off this weekend, curious OSU fans who spot the code can essentiallv "tip" the whole team after big plays. – Compiled by Robert Abitbol

LEGAL NOTICE

# If You Purchased Certain Clif Bar & Company Bars Since<br/>April 2014 You Could Receive a Cash Payment as Part<br/>of a Class Action Settlement.What is the lawsuit about? The lawsuit contends that Clif Bar & Company ("Clif Bar<br/>What is the lawsuit about? The lawsuit contends that Clif Bar & Company ("Clif Bar

What is the lawsuit about? The lawsuit contends that Clif Bar & Company ("Clif Bar") made certain statements on the labels of various original Clif Bars and Clif Kid ZBars ("Class Products") that are allegedly misleading because the statements suggested the bars are healthy, whereas Plaintiffs allege the bars are unhealthy because of their added sugar. Clif Bar maintains that these products are not unhealthy due to the presence of added sugars, and that the statements on its bars are true and not misleading. The Court has not determined whether Plaintiffs or Clif Bar is correct.

# Former Army financial counselor sentenced for bilking Gold Star families

dom. And they deserve our utmost respect and compassion, as well as some small measure of financial security from a grateful nation," Sellinger added. "No amount of money can undo their enormous loss. Instead of offering guidance, Caz Craffy chose to defraud these heroic families."

#### **Thao Nguyen** USA TODAY

A former U.S. Army financial counselor has been sentenced to more than 12 years in prison after admitting he defrauded families of fallen soldiers out of millions of dollars through a life insurance scheme, the U.S. Attorney's Office said.

Caz Craffy, 42, of Colts Neck, New Jersey, was sentenced to 151 months in prison after pleading guilty in April to six counts of wire fraud and other criminal charges, including securities fraud, making false statements in a loan application, committing acts affecting a personal financial interest and making false statements to a federal agency.

Craffy was a civilian employee for the Army from November 2017 to January 2023 and was a financial counselor with the Casualty Assistance Office, according to the U.S. Attorney's Office for the District of New Jersey. Prosecutors said Craffy was responsible for providing general financial education to the surviving beneficiaries of servicemembers killed while on active duty.

Surviving beneficiaries – known as Gold Star families – are entitled to a \$100,000 payment and up to \$400,000 from the servicemember's life insurance, which is disbursed over the weeks or months following the servicemember's death. Prosecutors said Craffy targeted Gold Star families and other military families, cheating them out of millions of dollars.

In addition, Craffy was sentenced to three years of supervised release and ordered forfeiture of \$1.4 million, the U.S. Attorney's Office said.

"Caz Craffy was sentenced to prison today for brazenly taking advantage of his role as an Army financial counselor to prey upon families of our fallen service members, at their most vulnerable moment, when they were dealing with a tragedy born out of their loved one's patriotism," U.S. Attorney Philip R. Sellinger said in a statement.

"These Gold Star families have laid the dearest sacrifice on the altar of free-

#### Craffy obtained more than \$9.9 million for trading

According to court documents, Craffy was prohibited from providing any personal opinions to beneficiaries. But while working for the Army, Craffy also had employment with two financial investment firms.

Craffy admitted he encouraged Gold Star families to invest their benefits into accounts he managed without notifying the Army, prosecutors said.

"Based upon Craffy's false representations and omissions, the vast majority of the Gold Star families mistakenly believed that Craffy's management of their money was done on behalf of and with the Army's authorization," according to the U.S. Attorney's Office.

Prosecutors said Craffy directed more than \$9.9 million from Gold Star families in accounts managed by him from May 2018 to November 2022. Craffy then used the money to make trades without the family's consent.

Craffy earned high commissions from these unauthorized trades, according to the U.S. Attorney's Office. Court documents showed that Gold Star families lost more than \$3.7 million in the scheme, while Craffy received more than \$1.4 million in commissions.

"The money these survivors are given does nothing to ease their suffering. It does, however, help with the burdens they face, such as paying off a mortgage or putting their children through college," FBI-Newark Special Agent in Charge James E. Dennehy said. "They believed Craffy was acting in their best interest, but instead, he was using their money as a method to make his own. Heartless and despicable don't even begin to sum up his crimes." Who is included? You are a Class Member if you bought one of the Class Products for household use, and not for resale or distribution, between April 2014 and March 2023 in California or New York, or between March 2019 and March 2023 in any other State. The Class Products include Original Clif Bars in packaging stating "Nutrition for Sustained Energy," and Clif Kid ZBars in packaging stating "No High Fructose Corn Syrup;" "Nourishing Kids in Motion;" "In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created Clif Kid – wholesome, delicious snacks made with organic ingredients to help keep kids going, growing, and exploring;" "Blend of carbs, fiber, protein, and fat gives kids energy so they can keep Zipping and Zooming along," and similar Challenged Claims (as identified in the Complaint in the Action).

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#### **NEWS**

# Week in review

Recapping the most important and talked about news this week from around the world – ICYMI

## **NEWS**

# Zuckerberg says he has regrets

Facebook founder Mark Zuckerberg acknowledged that the Biden administration had pressured the company to censor COVID-19 content in 2021 and added, "I regret that we were not more outspoken about it." In a letter Monday to the Republican-led House Judiciary Committee, the Meta CEO said that as a result of the pressure to curb targeted content – including even humor and satire – Facebook "made some choices that, with the benefit of hindsight and new information, we wouldn't make today."

# **OPINION**

# White House story is our story

The American-British friendship has been special for generations. But 210 years ago this month, British troops set fire to the White House, gutting it – the last time another nation invaded the continental U.S. That epic night in the War of 1812 became one of our strongest stories of resilience. Britain's leaders have returned to the White House many times now; its burning and restoration show how the layers of American history live side by side, every day, with our ongoing project of renewal. – *Stewart D. McLaurin, president, White House Historical Association* 

## **MONEY**

## So, who gets to do 'demure'?

Trademark-jumping is not exactly "mindful," "demure" – or very nice. Someone named Jefferson A. Bates sought to claim the phrase made viral by TikTok creator Jools Lebron, who tearfully told fans this week that she "dropped the ball" by not applying for the trademark herself. But in a new video on Tuesday, Lebron reassured her 2.1-million-plus followers that the battle over "very mindful, very demure" was being "handled," adding: "I'm gonna leave it at that. ... Mama got a team now." Stay tuned, though; as of Thursday, the rogue trademark application was still listed as "pending."



## IMAGE OF THE WEEK

#### Beautiful launch but fiery demise

A SpaceX Falcon 9 lifts off Wednesday from Florida's Cape Canaveral on its way to deploy satellites into orbit. The rocket's recoverable first stage, however, exploded on its return.

MALCOLM DENEMARK/ USA TODAY NETWORK

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# Oasis will tour again 15 years after split

Fifteen years after an epic fallingout, the battling brothers of Oasis are together again. The rock band, which formed in 1991 in Manchester, England, and broke up unexpectedly in 2009 after lead guitarist/songwriter Noel Gallagher said he could no longer work with frontman Liam Gallagher, announced Tuesday that it plans a series of live shows in the United Kingdom next year as part of a world tour. U.S. dates have not been announced. "The guns have fallen silent. The stars have aligned," the band said on its website. "The great wait is over."

# **SPORTS**

# An MLB first: Player suits up for both sides

Save that scorecard: For the first time in Major League Baseball history, a player played for both teams in the same game. It happened when catcher Danny Jansen started a game for the Toronto Blue Jays back on June 26, facing the Boston Red Sox, but rain forced the game to be suspended. On July 27, Jansen was traded to Boston. So on Monday, when Boston and Toronto finally resumed the contest, Jansen was behind the plate for the Red Sox in a statistical curiosity likely to live forever in baseball trivia. Footnote: Toronto won 4-1. - Compiled by Robert Abitbol

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# Israel presses on with assault in West Bank, says terrorist 'eliminated'

asking EU member states about expanding the sanctions list to include some Israeli ministers who have been launching "unacceptable hate messages against the Palestinians" and proposing actions that defy international law. "The Israeli major military operation in the occupied West Bank must not constitute the premises of a war extension from Gaza," Borrell wrote in a social media post.

# Kim Hjelmgaard and John Bacon

A large-scale Israeli military operation swept across the occupied West Bank for a second day Thursday, killing an alleged terrorist operative and fueling calls from senior international officials to end the offensive amid fears the territory could become a "war extension from Gaza."

The series of Israeli raids and drone strikes that began in the early hours of Wednesday morning in several West Bank flashpoint cities are targeting "terror groups and terror cells," Israel savs.

United Nations Secretary-General António Guterres described Israel's military operation in the Palestinian territory as "dangerous developments" that are "fueling an already explosive situation."

Mohammed Jaber, also known as Abu Shujaa, was killed following exchanges of fire in the West Bank's Nur Shams refugee camp outside the city of Tulkarm, the Israeli military said in a statement.

Jaber, described as the head of a terrorist network in Nur Shams, "was eliminated alongside four additional terrorists who hid inside a mosque," the statement said. An Israeli Border Police soldier was lightly injured and was evacuated to a hospital for medical treatment.

Mustafa Barghouti, a onetime Palestinian presidential candidate and the current leader of the Palestinian National Initiative political grouping, said the raids may be Israel's largest in the Palestinian territory since 2002. He accused Israel of seeking to expand its operation in Gaza to the West Bank.

Janez Lenarcic, the EU's commissioner for humanitarian aid and crisis management, said Israel's "indiscriminate use of military force and settler violence against civilians and extensive destruction of homes and infrastructure" was "in violation of international law and human rights."

Josep Borrell, the European Union's top foreign policy diplomat, said he was

# Families of hostages protest at border, make dash toward Gaza

Families of Israeli hostages being held in Gaza protested near the border Thursday, demanding that an agreement be reached to free their loved ones. Carrying photographs of the captives and wearing shirts marked with red paint, they gathered at kibbutz Nirim, a little more than mile from the Gaza border. They shouted messages of love and support through speakers pointed across the border, hoping some of the hostages might hear.

A few dozen of the protesters rushed the border, only to be stopped by Israeli police who warned they would be easy targets for armed militants.

# WHO announces 'pause' in fighting to allow polio vaccinations

The World Health Organization said Thursday that it has a preliminary commitment for an "area-specific humanitarian pause" in Gaza fighting as the U.N. prepares to administer polio vaccines to an estimated 640,000 children in Gaza beginning Sunday.

Rik Peeperkorn, the WHO senior official for the region, said the plan calls for a three-day pause in central Gaza, followed by similar pauses in first southern and then northern Gaza. A fourth day could be added if needed, he said. The Israeli military did not immediately comment on the report.

The WHO confirmed on Aug. 23 that at least one baby has been paralyzed by the type 2 poliovirus, the first such case in the territory in 25 years. Who is included? You are a Class Member if you bought one of the Class Products for household use, and not for resale or distribution, between April 2014 and March 2023 in California or New York, or between March 2019 and March 2023 in any other State. The Class Products include Original Clif Bars in packaging stating "Nutrition for Sustained Energy," and Clif Kid ZBars in packaging stating "No High Fructose Corn Syrup;" "Nourishing Kids in Motion;" "In raising our family, finding nutritious on-the-go snacks for our kids wasn't easy. That's why we created Clif Kid – wholesome, delicious snacks made with organic ingredients to help keep kids going, growing, and exploring;" "Blend of carbs, fiber, protein, and fat gives kids energy so they can keep Zipping and Zooming along," and similar Challenged Claims (as identified in the Complaint in the Action).

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# Supreme Court may hear dreadlocks case

# Rastafarian appeals to court over shaved haircut

#### Maureen Groppe USA TODAY

WASHINGTON – Damon Landor was prepared to protect the dreadlocks he had been growing for nearly two decades, in adherence to his Rastafarian beliefs, when serving a prison sentence in Louisiana for drug possession in 2020.

Landor carried a copy of a court ruling that dreadlocks grown for religious reasons should be accommodated, but an intake guard threw it in the trash and Landor was handcuffed to a chair while his knee-length locks were shaved off.

"My locks are a part of me and part of who I am," Landor said in a statement to USA TODAY, recalling how he counted on his religion to help him survive incarceration. "So when they cut off my hair, they cut off my crown."

Now the Supreme Court may take up the question of whether Landor and other inmates can sue individual prison officials for violating a 2000 law that protects the religious rights of prisoners.

The state condemns what happened to Landor "in the strongest possible terms," officials wrote in a filing that emphasized that the Louisiana Department of Corrections and Public Safety has amended its grooming policy to prevent a repeat of Landor's ordeal.

But Louisiana contends that the federal law doesn't allow Landor to hold correction officials personally liable for having his dreadlocks cut off. Otherwise, the state's attorneys wrote, there would be "numerous unintended consequences," including making it even more difficult to staff jails and prisons.

# Who should pay when religious rights are violated?

Landor, whose appeal is backed by more than 30 faith organizations, argues that monetary damages are often the only way to hold prison officials accountable when religious rights are violated.

"It is often damages or nothing," his lawyers told the Supreme Court in asking for intervention.

Many inmates who try to defend their rights are released or transferred by the time their claim is heard – when it's then dismissed as no longer relevant, according to religious groups that filed briefs supporting Landor.

"Unburdened by the threat of damages, prisons have little incentive to improve their policies and protect prisoners from future abuse," lawyers for groups representing Christians, Muslims, Jews and Sikhs told the Supreme Court.

Landor is supposed to be protected by the Religious Land Use and Institutionalized Persons Act, passed unanimously by Congress in 2000 to prevent state and local prisons from placing arbitrary or unnecessary restrictions on religious practices.

Twenty years after enactment, the Department of Justice said in a 2020 report, some institutions continue to impose substantial burdens without showing they're necessary.

Since the law was passed, the government has conducted dozens of investigations and either brought or supported lawsuits against jails and prisons. Most claims are raised by people practicing a religion other than Christianity, including Jews, Muslims, Sikhs and Native Americans.

Nearly 30% of cases alleging violations in the first five years after the law took effect were brought by Muslims, according to the Tayba Foundation, which supports incarcerated Muslims.

"In state prisons around the country, Muslims are targeted and deprived of basic accommodations for their faith – such as timely meals before and after religious fasts and the ability to pray without interference," the group told the Supreme Court.

In 2020, the high court ruled that Muslim men who claimed their religious rights were violated for being placed on the government's no-fly list after refusing to serve as FBI informants could sue the FBI agents for damages.

That case involved a different, though similar, federal law protecting religious expression. Appeals court judges who were sympathetic to Landor's situation said it's not their role to say whether the Supreme Court's 2020 ruling about federal officials should apply to state prison workers. The Supreme Court could decide in the coming weeks whether to review a lower court's ruling that sided with Louisiana in rejecting Landor's claim for damages.

# Shaved dreadlocks 'not exceedingly important'

"Landor clearly suffered a grave legal wrong," wrote Judge Edith Brown Clement in an opinion joined by eight other judges on the New Orleans-based 5th U.S. Circuit Court of Appeals. "The question is whether a damages remedy is available to him under RLUIPA. That is a question only the Supreme Court can answer."

Louisiana officials told the court the issue is "not exceedingly important." Congress has had ample time to amend the law to specifically allow damages if lawmakers thought that was necessary, the state argues.

And if damages are allowed, they continue, the state's "crushing workforce problem" would be overwhelmingly exacerbated.

Landor's attorneys told the court that unless they step in, Louisiana's stated commitment to preventing a reoccurrence of what happened to Landor will be an empty promise.

# Family claims surgeon removed wrong organ

# Jonathan Limehouse

The family of an Alabama man said 70-year-old William Bryan died after his liver was mistakenly removed during a medical procedure at a Florida hospital where Bryan went to have his spleen removed

Bryan went to Ascension Sacred Heart Emerald Coast Hospital in Walton County on Aug. 18 for a splenectomy, according to an operative report obtained by USA TODAY through Joe Zarzaur, the Bryan family's attorney.

Thomas Shaknovsky, a surgeon at the hospital, performed the procedure after discussing the "risks, benefits and alternatives" with Bryan and his wife, Beverly, the operative report says. Once the procedure was complete, instead of removing Bryan's spleen as intended, his liver was removed, according to a surgical pathology report Zarzaur provided to USA TODAY.

"I have the pleasure of representing Mrs. Bryan and her family. Unfortunately, we represent her in one of the most egregious cases of medical malpractice that I've ever been involved with," Zarzaur said at a news conference Tuesday. A spokesperson for Ascension emailed a statement to USA TODAY on Tuesday saying: "We take allegations like this very seriously, and our leadership team is performing a thorough investigation into this event. "Ascension Sacred Heart Emerald Coast has a longstanding history of providing safe, quality care since the hospital opened its doors in 2001," the statement said. "Patient safety is and remains our number one priority. Our thoughts and prayers remain with the family. We hold the privacy of our patients in the highest regard. We do not comment on specific patient cases or active litigation." Before the surgery, Bryan began suffering "severe abdominal pain" while on vacation with his wife at their condo in Destin, Florida, according to Zarzaur. Shaknovsky diagnosed him with hemoperitoneum and splenic injury, or bleeding of the spleen, the operative report says. Beverly Bryan initially elected to hold off on surgery until the couple got back to their home in Alabama, but she said Shaknovsky told her her husband would bleed to death if he traveled in his condition. Zarzaur said.

that had some hemorrhage around it, but it was not a fatal issue," Zarzaur said. "It was a fairly routine-looking cyst. It probably would have been very treatable."

Beverly Bryan spoke during the news conference Tuesday and called her husband of 33 years "such a good man."

"I was lucky enough to be the wife of William Bryan, who's also known as Bill Bryan, and I'll always be grateful for the time that I had with him," she said. "We have three children (and) eight grandchildren and they're grateful for the time that they had with him too."

Beverly Bryan said her family is "heartbroken and angry that Bill isn't here due to the incompetence of the doctors involved in the negligence of the Ascension Hospital."

"They took him from us while he was completely helpless on the operating table," she said. "They removed his liver instead of his spleen, so of course, he bled to death on the operating table."

She called her husband's death "unnecessary and brutal" and said her famongoing investigation."

Another incident involving Shaknovsky was settled in 2023 when he intended to take out an adrenal gland off somebody's kidney, but he ended up taking out a part of their pancreas, Zarzaur said. The case was settled for a confidential amount, so no lawsuit was filed against the surgeon or Ascension Sacred Heart Emerald Coast Hospital, according to the attorney.

"That one got swept under the rug," he said. "Here we are in a case after that."



**Pictured is 70-year-old William Bryan and his wife, Beverly Bryan.** PROVIDED BY JOE ZARZAUR OF ZARZAUR LAW, PA

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During the surgery Aug. 21, Bryan died from massive blood loss after the removal of the "large" spleen, according to the operative report.

"Case was discussed at length with patient's wife and family and they were updated on unfortunate developments," the report continued. "All events regarding the surgery were discussed with the family. All questions were answered."

After the procedure, a pathologist realized the removed organ labeled "spleen" was actually liver tissue, according to Zarzaur. Once an autopsy was done, the medical examiner determined Bryan's liver was gone and his spleen was still in his body with a cyst attached to it, the attorney said.

"The spleen had a small cyst on it

ily and their community in Alabama is "devastated."

"He brought joy to every life that he ever touched," Beverly Bryan said. "He was the best husband and father that I could have possibly asked for. ... I'll get through this and I'm going to be strong for him because he deserves justice for this."

A complaint has not been filed as of Tuesday because, according to Florida law, a six- to nine-month process must take place before filing a formal medical malpractice lawsuit with the court, Zarzaur said. Bryan's family and Zarzaur do intend to file a lawsuit, they said, but the concern now is that Shaknovsky may still be practicing medicine, according to the attorney.

"This doctor was still treating patients, and apparently still had access to hospitals and operating rooms, which I don't think he should," Zarzaur said. "Mrs. Bryan obviously doesn't feel like he should ever step foot in a hospital or operating room ever again."

The medical board could take months to revoke Shaknovsky's medical license, according to Zarzaur. The attorney said he has been in contact with people who have told him they saw the surgeon in the past week. A criminal investigation is also underway, Zarzaur said, adding that all questions should be asked to the Walton County Sheriff's Office. The sheriff's office emailed a statement to USA TODAY on Tuesday.

"Walton County Sheriff's Office in conjunction with the District 1 Medical Examiner's Office and Office of the State Attorney is reviewing the facts involving the death of William Bryan to determine if anything criminal took place," the statement said. "At this time, it would be incorrect to say criminal charges have been filed."

"Our agency asks for the public's patience as these cases are extremely complex and take time to investigate. The only reliable source of information regarding any criminal case will come from our office. At this time, any records regarding this case are exempt from public disclosure so as not to impede an added sugars, and that the statements on its bars are true and not misleading. The Court has not determined whether Plaintiffs or Clif Bar is correct.

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EAG Gulf Coast, LLC

Exhibit J: Exclusions

<b>Exclusion Requests</b> Ralph Milan et al. v. Clif Bar & Co., Case No. 18-cv-2354-JD					
Count	First Name	Last Name	State	Received Date	
1	Tim	Perdue	OK	8/9/2024	
2	Brian	Creasey	NC	8/16/2024	
3	Jonathan	Souza	NJ	8/22/2024	
4	Jack	Ollendick	MN	8/22/2024	
5	Sharan	Subramanian	CA	8/23/2024	
6	Thomas	Sorial	ΤХ	8/25/2024	
7	Faith	Wilsey	CA	9/1/2024	
8	Alexander	Kim	CA	10/3/2024	
9	Nirvaan	lyer	NY	10/3/2024	
10	Spencer	Kulbacki	CA	10/3/2024	
11	Jonathan	Lovelace	MI	10/3/2024	
12	Jonathan	Lilley	CA	10/3/2024	
13	Andrew	Alder	CO	10/3/2024	
14	Stephen	Wright	PA	10/3/2024	
15	Maryam	Taheri	ΤХ	10/3/2024	
16	Charity	Huizinga	FL	10/3/2024	
17	Ryan	Wenger	VA	10/3/2024	
18	Justin	Goodhart	NY	10/3/2024	
19	Bob	Raible	KY	10/3/2024	
20	Shannon	Donovan	VA	10/3/2024	
21	Michael	Aiken	SC	10/3/2024	
22	Wayne	Goldner	NH	10/3/2024	
23	Paul	Baker	IL	10/3/2024	
24	Stephanie	Harris	ΤХ	10/3/2024	
25	Wendy	May	WY	10/3/2024	
26	Melissa	Steingass	ОН	10/3/2024	
27	Mike	Boudet	ΤХ	10/3/2024	
28	Joseph	Ragole	VA	10/3/2024	
29	Brad	Verret	TX	10/3/2024	
30	Leticia	Babcock	CA	10/3/2024	
31	Michael	Robb	CA	10/3/2024	
32	Stephen	Vanias	NC	10/3/2024	
33	Brian	Detwiler	MD	10/3/2024	
34	Eurecia	Matthews	GA	10/3/2024	
35	Ashley	Simms	CA	10/3/2024	
36	Rebekah	Opperman	CA	10/3/2024	
37	Hannah	Lees	CO	10/3/2024	
38	Michael	Rodgers	ME	10/3/2024	
39	James	Johnson	NC	10/3/2024	
40	Donald	Olsen	UT	10/3/2024	
41	Emily	Stansbury	CA	10/3/2024	

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42	Kathryn	Stepanski	CA	10/3/2024	
43	Brian	Kaiser	FL	10/3/2024	
44	Christina	Hallmeyer	CA	10/3/2024	
45	Joanne	Sours	OH	10/3/2024	
46	Denise	Oishi	HI	10/3/2024	
47	Scott	Mueller	CA	10/4/2024	
48	Frank	Bara	MD	10/4/2024	
49	William	Slivers	WA	10/4/2024	
50	Jason	Buster	CA	10/4/2024	
51	Cedric	Clendenon	WA	10/4/2024	
52	Pontus	Niklasson	WA	10/4/2024	
53	Steve	Wickert	PA	10/4/2024	
54	Amit	Rind	NY	10/4/2024	
55	Don	Johnson	ТΧ	10/4/2024	
56	Franciele	Silva	MA	10/4/2024	
57	James	Porter	FL	10/5/2024	
58	Karen	Katz	PA	10/5/2024	
59	Justin	Workman	OR	10/5/2024	
60	Travis	Ledford	NC	10/5/2024	
61	Maike	Tarrach	CA	10/5/2024	
62	Lynne	Schonder	CA	10/7/2024	
63	Michael	Galati	CA	10/7/2024	
64	Mary Leanne	Purvis	MD	10/8/2024	
65	Joellen	Magnus	ND	10/8/2024	
66	Jessica	Rose	PA	10/9/2024	
67	Sarah	Schwanbeck	CA	10/10/2024	
68	Heather	Butler	CA	10/10/2024	
69	Elizabeth	Gaukroger	FL	10/10/2024	
70	Alayne	Mckeown	CA	10/11/2024	
71	April	Williams	ТΧ	10/11/2024	
72	Christopher	Marvin	IL	10/12/2024	
73	Amanda	Scott	GA	10/13/2024	
74	Charles	Natalie	ТΧ	10/13/2024	
75	Anthony	Nelson	ТΧ	10/13/2024	
76	Todd	Schuman	СТ	10/14/2024	
77	Derrick	Cooper	DC	10/14/2024	
78	Richard	Barrett	NM	10/14/2024	
79	Michael	Lufrano	IL	10/14/2024	
80	Joey	Heck	CA	10/16/2024	
81	Christy	Currey	GA	10/16/2024	
82	Kimberly	Benning	CA	10/17/2024	

Exclusion Requests						
	Ralph Milan et al. v. Clif Bar & Co., Case No. 18-cv-2354-JD					
Count	First Name	Last Name	State	Received Date		
83	Christian	Кпарр	IL	10/17/2024		
84	Brian	Famous	NC	10/18/2024		
85	Matthew	Bornfreund	FL	10/19/2024		
86	Nicole	Strauss-Haebler	OR	10/20/2024		
87	Brett	Oliver	MN	10/20/2024		
88	Brittany	Walter	MN	10/20/2024		
89	Michael	Billman	KY	10/21/2024		
90	Lillian	Johnson	MD	10/21/2024		
91	Sylvia	Anderson	WA	10/21/2024		
92	Lana	Reyes	AP	10/22/2024		
93	llya	Ghassemi	IL	10/22/2024		

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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26	IN THE UNITED FOR THE NORTHER	STATES DISTRICT COURT RN DISTRICT OF CALIFORNIA ANCISCO DIVISION
26 27 28		
28		Case No. 18-cv-02354-JD [PROPOSED] ORDER GRANTING FINAL APPROVAL

This matter came on for hearing on November 14, 2024, at 10:00 a.m.. The Court has
 considered the Settlement Agreement filed on October 31, 2023 (the "Settlement Agreement"). An
 opportunity to be heard having been given to all other persons desiring to be heard as provided in
 the Notice and having considered all of the submissions and arguments, and good cause appearing
 therefore;

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#### IT IS HEREBY ORDERED AS FOLLOWS:

7 1. This Final Order incorporates herein and makes a part hereof the Settlement
8 Agreement, including the Exhibits thereto, and incorporates by reference the definitions in the
9 Settlement Agreement, and all terms used herein shall have the same meanings as set forth in the
10 Settlement Agreement unless set forth differently herein.

- 11
  2. The Court has jurisdiction over the subject matter of this action, and all Parties to the
  12 action for purpose of settlement, including all Settlement Class Members.
- 13 3. Pursuant to Federal Rule of Civil Procedure 23, the Court certifies the following
  14 Settlement Class for settlement purposes, only:
- 4 Settlement Class for settlement purposes, only:
- All persons who, during the "Class Period" as defined in Section 2.13 of the
  Settlement Agreement, purchased in the United States, for household use and not
  for resale or distribution, original Clif Bars in packaging bearing the phrase
  "Nutrition for Sustained Energy," and Clif Kid ZBars in packaging bearing the
  Challenged Claims (as identified in the Complaint in the Action).<sup>1</sup>
- 19 4. Pursuant to Federal Rule of Civil Procedure 23(a), the Court finds Plaintiffs Ralph
- 20 Milan and Elizabeth Arnold are members of the Settlement Class, their claims are typical of the

21 Settlement Class, and they fairly and adequately protected the interests of the Settlement Class

- 22 throughout their involvement in this action. Accordingly, the Court hereby appoints Ralph Milan
- 23 and Elizabeth Arnold as Class Representatives for the Settlement Class.
- 245. The Court finds that the Settlement Class meets all requirements of Federal Rules of25Civil Procedure 23(a) and (b)(3) for certification of the claims alleged in the Class Action
- 26

<sup>6</sup> Settlement Class.

 <sup>27
 &</sup>lt;sup>1</sup> Excluded from the Settlement Class are: (a) Clif Bar's board members or executive-level officers including its attorneys; (b) governmental entities; (c) the Court, the Court's immediate family, and the Court's staff; and (d) any person that timely and properly excluded himself or herself from the

Complaint, including: (a) numerosity; (b) commonality; (c) typicality; (d) adequacy of the class
 representative and Class Counsel; (e) predominance of common questions of fact and law among
 the Settlement Class; and (f) superiority.

6. Having considered the factors set forth in Federal Rule of Civil Procedure 23(g)(1),
the Court makes final its appointment of Fitzgerald Monroe Flynn PC as Class Counsel to represent
the Class Members.

7 7. The Court finds that the persons excluded from the Settlement Class because they
8 filed valid Requests for Exclusion ("Opt-Outs") are identified in Exhibit J to the Declaration of
9 Brandon Schwartz submitted in support of Plaintiffs' Motion for Final Approval. These Class
10 Members who filed timely, completed Opt-Outs are not bound by this Order and the accompanying
11 Final Judgment or the terms of the Settlement Agreement and may pursue their own individual
12 remedies against Defendant. However, such persons are not entitled to any rights or benefits
13 provided to Class Members by the terms of the Settlement Agreement.

8. The Court directed that Class Notice be given to the Class Members pursuant to the 14 15 notice program proposed by the Parties and approved by the Court. In accordance with the Court's Preliminary Approval Order and the Court-approved notice program, the Settlement Administrator 16 caused the forms of Class Notice to be disseminated as ordered. The Long-form Class Notice 17 advised Class Members of the terms of the Settlement Agreement; the Final Approval Hearing, and 18 19 their right to appear at such hearing; their rights to remain in, or opt out of, the Settlement Class and 20to object to the Settlement Agreement; procedures for exercising such rights; and the binding effect 21 of this Order and accompanying Final Judgment, whether favorable or unfavorable, to the Settlement Class. 22

9. The distribution of the Class Notice pursuant to the Class Notice Program constituted
the best notice practicable under the circumstances, and fully satisfies the requirements of Federal
Rule of Civil Procedure 23, the requirements of due process, 28 U.S.C. § 1715, and any other
applicable law.

27 10. Pursuant to Federal Rule of Civil Procedure 23(e)(2), the Court finds after a hearing
28 and based upon all submissions of the Parties and interested persons, the Settlement Agreement

Case No. 18-cv-02354-JD

proposed by the Parties is fair, reasonable, and adequate. In reaching this conclusion, the Court 1 2 considered the record in its entirety and heard the arguments of counsel for the Parties and all other 3 persons seeking to comment on the proposed Settlement Agreement. In addition, the Court has considered a number of factors, including: (1) the complexity, expense, and likely duration of the 4 5 litigation; (2) the reaction of the Class Members to the Settlement Agreement; (3) the stage of the proceedings and the amount of discovery completed; (4) the risks of establishing liability; (5) the 6 7 risks of establishing damages; (6) the risks of maintaining the class action through the trial; (7) the 8 ability of Defendant to withstand a greater judgment; and (8) the reasonableness of the relief 9 provided by the Settlement Agreement in light of the best possible recovery.

10 11. The terms and provisions of the Settlement Agreement are the product of lengthy,
11 arm's length negotiations conducted in good faith and with the assistance of experienced mediators.
12 Approval of the Settlement Agreement will result in substantial savings of time, money and effort
13 to the Court and the Parties, and will further the interests of justice.

14 12. All Class Members who have not timely and validly opted out are Class Members
15 who are bound by this Order and accompanying Final Judgment and by the terms of the Settlement
16 Agreement.

17 13. Nothing in the Settlement Agreement, this Order, the accompanying Final Judgment,
18 or the fact of the settlement constitutes any admission by any of the Parties of any liability,
19 wrongdoing or violation of law, damages or lack thereof, or of the validity or invalidity of any claim
20 or defense asserted in the action.

14. 21 The Court has considered the submissions by the Parties and all other relevant factors, including the result achieved and the efforts of Class Counsel in prosecuting the claims on 22 23 behalf of the Settlement Class. The efforts of Class Counsel have produced the Settlement 24 Agreement entered into in good faith, and which provides a fair, reasonable, adequate, and certain result for the Settlement Class. Class Counsel have made application for an award of attorneys' fees 25 and reimbursement of expenses in connection with the prosecution of the action on behalf of 26 27 themselves. The fee award requested is 30% of the Common Fund. The Court hereby awards 28 \$ [\$3,600,000 requested] as attorneys' fees to be paid in accordance with the terms

of the Settlement Agreement. This amount is fair, reasonable, and adequate under the common fund 1 doctrine, the range of awards ordered in this District and Circuit, the excellent results obtained, the 2 3 substantial risk borne by Class Counsel in litigating this matter, the degree of skill and quality of work performed, the financial burden imposed by the contingency basis of Class Counsel's 4 5 representation of Plaintiffs and the Class, and the additional work required of Class Counsel to bring this Settlement to conclusion. The Court finds the fee award is further supported by a lodestar 6 7 crosscheck, whereby it finds that the hourly rates of Plaintiffs' Counsel are reasonable, and that the 8 estimated hours expended are reasonable.

9 15. Class Counsel have also made application for reimbursement of litigation expenses.
10 Finding that such expenses were reasonably and necessarily incurred in prosecuting the action on
11 behalf of the Settlement Class, the Court finally approves Class Counsel's request for litigation
12 expenses in the amount of \$\_\_\_\_\_ [\$861,337 requested], to be paid in accordance with
13 the terms of the Settlement Agreement.

14 16. Further, the Court approves service awards of \$\_\_\_\_\_\_ each [\$5,000 requested] for
15 Ralph Milan and Elizabeth Arnold. The Class Representatives participated in the action, acted to
16 protect the Settlement Class, and assisted their counsel. These service awards, which are fair,
17 reasonable, and justified, are to be paid in accordance with the terms of the Settlement Agreement.

17. The Court has considered all relevant factors and hereby approves the Resnick Center
for Food Law and Policy at the University of California, Los Angeles, School of Law, and Tufts
University Friedman School of Nutrition Science & Policy as the designated *cy pres* recipients of
any monies (if any) remaining after the negotiation period of the Cash Payments in accordance with
the Agreement. The Court overrules the objection of Scott Dodson with respect to the *cy pres*recipients.

24 18. The Court hereby dismisses with prejudice this action, and all Released Claims
25 against each and all Released Parties, and without costs to any of the Parties as against the others.

Pursuant to the Northern District of California's Procedural Guidance for Class
Actions, within twenty-one (21) days after the distribution of the settlement funds, the Parties shall
file a Post-Distribution Accounting detailing when cash payments were sent to Class Members, the

Case No. 18-cv-02354-JD

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number of Class Members who were sent payments, the total amount of payments paid out to Class
Members, the average and median recovery per Class Member, the largest and smallest amounts of
cash payments paid to Class Members, the number and value of cashed and uncashed checks, the
amount distributed to any *cy pres* recipient, any significant or recurring concerns communicated by
Class Members to the Settlement Administrator and counsel since final approval, and any other
issues in settlement administration since final approval, and how any concerns or issues were
resolved.

8 20. Without affecting the finality of this Order and the Final Judgment, the Court
9 reserves jurisdiction over the implementation, administration, and enforcement of this Order, the
10 Final Judgment and the Settlement Agreement, and all matters ancillary thereto.

11 21. The Court finding that no reason exists for delay in entering this Order and the Final
12 Judgment pursuant to Federal Rules of Civil Procedure, Rule 54(b), the Clerk is hereby directed to
13 enter the Final Judgment forthwith.

14 22. The Parties and the Settlement Administrator are hereby directed and authorized to
15 implement and consummate the Settlement according to the terms and provisions of the Settlement
16 Agreement. In addition, the Parties, without further approval of the Court, are authorized to agree
17 to and adopt such amendments and modifications to the Settlement Agreement so long as they are:
18 (i) consistent in all material respects with this Final Order and the Final Judgment; and (ii) do not
19 limit the rights of the Settlement Class.

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#### IT IS SO ORDERED.

#### HONORABLE JAMES DONATO UNITED STATES DISTRICT JUDGE

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5	IN THE UNITED STATES DISTRICT COURT			
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7	SANTRANCI			
8	RALPH MILAN and ELIZABETH ARNOLD	Case No. 18-cv-02354-JD		
9	on behalf of themselves, those similarly situated and the general public,	CLASS ACTION		
10	Plaintiffs,	[PROPOSED] FINAL JUDGMENT		
11	V.	Judge: Hon. James Donato		
12	CLIF BAR & COMPANY,	Complaint Filed: April 19, 2018		
13	Defendant.			
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		Case No. 18-cv-02354-JD [PROPOSED] FINAL JUDGMENT		

	Case 3:18-cv-02354-JD Document 268-5 Filed 10/31/24 Page 2 of 2
1	IT IS HEREBY ADJUDGED AND DECREED PURSUANT TO FEDERAL RULE OF
2	CIVIL PROCEDURE 58 AS FOLLOWS:
3	(1) On this date, the Court entered an Order Granting Final Approval of Class Action
4	Settlement in the above-captioned action; and
5	(2) Final judgment is entered in accordance with the Order Granting Final Approval of
6	Class Action Settlement, for the reasons stated therein, and the above-captioned action is dismissed
7	with prejudice.
8	SO ORDERED this day of, 2024.
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10	HONORABLE JAMES DONATO
11	UNITED STATES DISTRICT JUDGE
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	-1- Case No. 18-cv-02354-JD
	[PROPOSED] FINAL JUDGMENT