

1 I, Luiggy Segura, declare and state as follows, pursuant to 28 U.S.C. § 1746:

2 1. I am a Director employed by JND Legal Administration (“JND”). The
3 following statements are based on my personal knowledge and information provided by
4 other JND employees working under my supervision and, if called on to do so, I could
5 and would testify competently thereto.

6 2. JND was retained by Lead Counsel in the above-captioned litigation (the
7 “Action”), and appointed pursuant to the Court’s Order Granting Preliminary Approval of
8 Class Action Settlement, Approving Form and Manner of Notice, and Setting Date for
9 Hearing on Final Approval of Settlement (ECF No. 138, the “Preliminary Approval
10 Order”), to serve as the Claims Administrator. I submit this Supplemental Declaration in
11 order to provide the Court with additional information regarding the mailing of the
12 Notice of Pendency of Class Action, Proposed Settlement, and Motion for Attorneys’
13 Fees and Expenses (the “Notice”), and the Proof of Claim and Release (the “Proof of
14 Claim” and collectively with the Notice, the “Notice Packet”); exclusions and objections
15 received to date; and the claims received to date.

16 **DISSEMINATION OF THE NOTICE PACKET**

17 3. As described in the Declaration of Luiggy Segura Regarding (A) Mailing of
18 the Notice and Proof of Claim; (B) Publication of the Summary Notice; and (C) Report
19 on Requests for Exclusion Received (“Initial Mailing Declaration”), previously filed with
20 the Court (ECF No. 141-3), in accordance with the Preliminary Approval Order, JND
21 commenced the mailing of the Notice Packets to potential Class Members on April 24,
22 2020.

23 4. As of July 13, 2020, a total of 58,568 Notice Packets have been
24 disseminated to potential Class Members and banks, brokers, and other nominees
25 (“Nominees”) by first-class mail.

26 5. As of July 13, 2020, 1,395 Notice Packets have been returned by the United
27 States Postal Service to JND as undeliverable. Of those returned, 450 had forwarding
28 addresses and were promptly re-mailed to the updated address.

1 **EXCLUSION REQUESTS**

2 6. The Notice informed potential Settlement Class Members that requests for
3 exclusion from the Settlement Class were to be mailed to LifeLock Securities Litigation,
4 EXCLUSIONS, c/o JND Legal Administration, P.O. Box 91368, Seattle, WA 98111,
5 such that they are received no later than June 30, 2020. The Notice also set forth the
6 information that must be included in each request for exclusion. JND monitors all mail
7 delivered to the P.O. Box for the Action. As of July 13, 2020, JND has received 1
8 request for exclusion. Attached hereto as Exhibit A is the request for exclusion.

9 **OBJECTIONS**

10 7. Although Settlement Class Members who wish to object to the Settlement,
11 the request for attorneys' fees and expenses, or the proposed plan of allocation were to
12 file objections with the Clerk of the Court and mail them to counsel, JND has checked its
13 mail as well and, as of the date of this Supplemental Declaration, JND has received no
14 objections.

15 8. However, JND has been advised by Lead Counsel that an objection was
16 submitted by James Snyder related to, in part, the timing of his receipt of a Notice Packet.
17 As set forth above, on April 24, 2020, as ordered by the Court, JND began to mail Notice
18 Packets to potential members of the Settlement Class identified by LifeLock, potential
19 class members identified by JND through Form 13-F filings, and all nominees in JND's
20 proprietary Broker Database, which included Charles Schwab.

21 9. As also explained in the Initial Mailing Declaration, the Notice directed
22 nominees that purchased or otherwise acquired shares of LifeLock publicly traded
23 common stock and/or options during the Class Period for the benefit of individuals or
24 entities other than themselves, to either (a) within seven (7) calendar days of receipt of
25 the Notice, provide a list of the names and addresses of all such beneficial owners to the
26 Claims Administrator; or (b) within seven (7) calendar days of receipt of the Notice,
27 request from the Claims Administrator sufficient copies of the Notice to forward to all
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1 such beneficial owners and within seven (7) calendar days of receipt of those Notices,
2 forward them to all such beneficial owners.

3 10. On May 22, 2020, Charles Schwab responded to the mailing via a secure
4 email that was password protected. Once JND was able to confirm the password to the
5 secure email, JND identified a spreadsheet with over 4,500 names and addresses. This
6 spreadsheet included Charles Schwab client James Snyder, with an address that matches
7 the Atlanta, GA address reported by Mr. Snyder in a claim (based on 780 shares) that he
8 submitted via the settlement website's online claim filing portal.

9 11. As we do with all broker files we receive, our first step was to review and
10 assess the data submitted by Charles Schwab. Because names and addresses provided by
11 brokerage firms are not usually submitted in a uniform or consistent manner, JND's data
12 team spends a substantial amount of time readying broker provided data for use in a
13 mailing. For example, our team identifies addresses that are mistakenly included in name
14 fields, parses out names that are mistakenly imbedded in addresses, and makes sure that
15 all entries include full addresses with street names, cities, states, and zip codes. In
16 addition, JND's data team identifies duplicate names and addresses and removes them
17 from the list.

18 12. Once this data cleanup is completed, "Mail Files" are created to be utilized
19 by our printer partner. (For small volumes, JND prints notice packets in house, but
20 typically anything larger than 2500 names requires that we work with one of our
21 established printers.) These Mail Files are created so that the printer is able to sort the
22 addresses to obtain postal discounts and separate domestic from international addresses.
23 The Mail Files are quality checked prior to being sent to the printer. The review of the
24 Mail Files includes a comparison of the created file against the original data provided to
25 JND. JND confirms that the correct number of names and addresses were created, that no
26 names and addresses were mismatched, and that all name and address information was
27 captured accurately, among other things. Mail Files are then transmitted to the printer so
28 that the mailings can be prepared. Finally, prior to a mailing, JND samples mailings to

1 inspect the quality of the materials and envelopes printed, and that the names and
2 addresses were printed correctly.

3 13. JND took all of these necessary steps to fulfill the entirety of the Charles
4 Schwab mailing request, and mailed all 4500 notices, including Mr. Snyder's Notice
5 Packet, on June 11, 2020.

6 14. Mr. Snyder filed a claim on June 17, 2020, via the settlement website's
7 online claim filing portal. The claim included all the required supporting documentation
8 and it is in good standing.

9 15. Pursuant to the Preliminary Approval Order, the Notice Packet mailings
10 began on April 24, 2020 and the objection and exclusion deadline was June 30, 2020.
11 This is an interval of 67 days. The interval between the Notice Date and the July 16,
12 2020 claim deadline is 84 days. In my experience, these are very standard time intervals.

13 **CLAIMS RECEIVED TO DATE**

14 16. The Notice also informed potential members of the Settlement Class that if
15 they wished to receive a payment from the Settlement, they must submit a Claim Form to
16 JND, with supporting documentation, postmarked or received by July 16, 2020. Through
17 July 13, 2020, JND has received a total of 2,525 Claims. Of note, many institutional
18 investors and custodians file very close to or on the actual claim deadline, rather than in
19 advance, so it is anticipated that the Claim count will increase substantially. Also,
20 Claims that are postmarked on the claim deadline will not be received for several days. It
21 is typical to receive claims after the claim deadline in cases similar to this one, and they
22 are processed as they are received. Pursuant to the Preliminary Approval Order, ¶ 13(a),
23 late Claims may be allowed in the Court or Lead Counsel's discretion and it is typical to
24 allow late claims.

25 17. JND's preliminary analysis of the Claims submitted to date shows that 548
26 paper Claims have been received, 313 on-line Claims have been submitted via the
27 Settlement website, and 1,664 electronic claims have been submitted by institutional
28 filers.

1 18. All Claims are still subject to a comprehensive review under JND's
2 standard claims-processing procedures, which will identify any deficiencies and
3 conditions of ineligibility in Claims. Claimants will then be given an opportunity to
4 correct their Claims. Accordingly, it is not possible to report valid and invalid Claims at
5 this point of time.

6 I declare under penalty of perjury under the laws of the United States of America
7 that the foregoing is true and correct to the best of my knowledge.

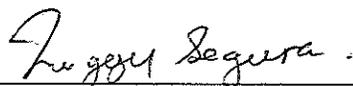
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9 Executed on July 13th, 2020, in New Hyde Park, New York.

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Luiggy Segura

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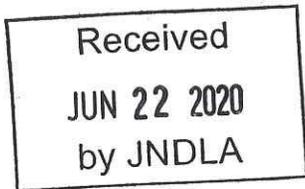
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EXHIBIT A

Exclusion Request No 1

Carol A. Dunning

Clifton, New Jersey 07013



June 15, 2020

LifeLock Securities Litigation
EXCLUSIONS
c/o JND Legal Administration
PO Box 91368
Seattle, WA 98111

To whom it may concern:

This letter is written to request to be excluded from the Settlement Class in Miguel Avila, et al v. LifeLock, Inc. et al. Case No .2:15-cv-01398-SRB (D-Arizona).

(i) Name, address, phone number:

Carol A. Dunning

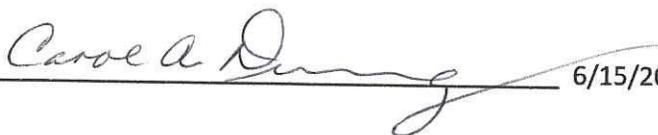
Clifton, New Jersey 07013

(ii) Number of LifeLock Stock:

I purchased 100 shares via Merrill Edge on 3/10/15 during and there was a common stock merger and I received \$2400 for the shares on 2/09/17 with a profit of \$1,012.43 so the stock would have cost $\$2400 - 1012.43 = \1387.57 when I purchased it. (See attached copy of Merrill Edge Document.)

I do not want to be part of this suit because it states "all persons and entities who or which purchased or otherwise acquired shares of LifeLock publicly traded common stock and/or call options and/or sold LifeLock publicly traded put options during the period of July 31, 2014 through July 21, 2015, inclusive, and were damaged thereby." I purchased the stock in March 2015 and made a profit when there was a merger in 2017. I was not damaged, and I have no reason to sue LifeLock relative to this case. I have used LifeLock for years for identity protection.

(iii) Signature of person requesting the exclusion.


6/15/2020



Account Number

CAROL A DUNNING

YOUR INDIVIDUAL INVESTOR ACCOUNT TRANSACTIONS

January 01, 2017 - March 31, 2017

DIVIDENDS/INTEREST INCOME TRANSACTIONS (continued)		Quantity	Description	Income	Income Year To Date
Date	Transaction Type				
03/30	*Dividend				
Subtotal (Taxable Dividends)					
NET TOTAL					

SECURITY TRANSACTIONS		Quantity	Transaction Amount	Commissions/Trading Fees	(Debit)/Credit	Accrued Interest Earned/(Paid)
Settlement Date	Description					
02/09	LIFELock INC COMMON STOCK CASH MERGER PAY DATE 02/09/2017	-100.0000			2,400.00	
Subtotal (Other Security Transactions)						2,400.00
TOTAL						2,400.00

TOTAL SECURITY PURCHASES/(DEBITS)		TOTAL SECURITY SALES/CREDITS	
2,400.00		2,400.00	

REALIZED GAINS/(LOSSES)		Quantity	Acquired Date	Liquidation Date	Sale Amount	Cost Basis	This Statement	Year To Date
Description								
LIFELock INC		100.0000	03/10/15	02/09/17	2,400.00	1,387.57	1,012.43	1,012.43
Subtotal (Long-Term)						1,012.43	1,012.43	1,012.43
TOTAL						1,387.57	1,012.43	1,012.43

⊗ - Excludes transactions for which we have insufficient data

Carol A Dunning





EV DANIELS NJ070

17 JUN 2020 PM 101

JUN 28 2020

Life lock Securities Litigation

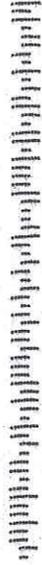
Exclusions

c/o JND Legal Administration

Po Box 91368

Seattle, WA 98111

9811-01068



C Dunning

Clifton NJ 07013