

**CIRCUIT COURT FOR THE NINTH JUDICIAL DISTRICT
COUNTY OF MCDONOUGH, STATE OF ILLINOIS**

H.K. and J.C., through their father and legal guardian CLINTON FARWELL, and M.W., through her mother and legal guardian ELIZABETH WHITEHEAD, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 2020LL00017

Judge: Hon. Heidi A. Benson

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

I, Ryan Aldridge, hereby declare and state as follows:

1. I am a Partner at EisnerAmper¹, a full-service administration firm providing legal administration services, including the design, development, and implementation of unbiased complex legal notification programs.

2. The *Declaration of Brandon Schwartz Regarding Notice Plan and Settlement Administration* (“Schwartz Declaration”), filed on September 15, 2025, detailed the implementation of the Notice Plan and Settlement Administration. I have supervised the notification and claims process in this action and I submit this supplemental declaration to report

¹ As of May 21, 2023, the Directors & employees of Postlethwaite & Netterville (P&N), APAC joined EisnerAmper as EAG Gulf Coast, LLC.

on Claim activity.

Claim Form Submissions and Fraud Analysis

Overview

3. Class Members have the option of submitting Claims online or mailing the printed Claim Form to the Settlement Administrator. The online Claim Form feature became available on the Settlement Website beginning on June 18, 2025, along with the downloadable Claim Form.

Summary of Submitted Claims

4. The deadline to submit a Claim is October 16, 2025. As of October 3, 2025, EisnerAmper has received 16,321 net Claim submissions. EisnerAmper shall continue to intake and analyze Claims submitted through the Claims Deadline. Table 1 below provides summary statistics of Claim submissions and current dispositions.

Table 1

Claims Statistics Summary (as of October 3, 2025)	
Description	Volume (#)
Total Claims Received	431,668
(-) Invalid Claims	964
(-) Duplicate Claims	60,048
(-) High Confidence Fraud Claims	354,335
Net Claims Received	16,321

Fraud Procedures and Analysis

5. To combat rampant fraud in class action settlements and to protect the interest of valid claimants, EisnerAmper employs cutting-edge, three-tiered defense strategy that combines industry-leading technologies with human oversight. EisnerAmper's first line of defense is an advanced machine learning-supported Web Application Firewall ("WAF"). The WAF is continuously updated in real time based on insights from the global network, ensuring proactive protection against emerging threats. The second tier of defense utilizes sophisticated AI

algorithms to detect and mitigate bot and scripted browser traffic, effectively distinguishing between legitimate and malicious activities to prevent attacks like credential stuffing in real time. These algorithms compare data across all active case websites allowing EisnerAmper to identify patterns and bad actors across tens of millions of website interactions. The third and most comprehensive line of defense involves a team of dedicated fraud prevention specialists who employ a proprietary, multi-faceted 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.

6. Findings from the claims analysis, as presented in Table 1 above, categorize all Claims into three district tiers: invalid Claims, duplicate Claims, and high confidence fraudulent Claims.

7. **Invalid Claims:** Defined as Claims submitted by individuals who are not members of the Settlement Class as determined based on the information provided on the Claim submission.

8. **Duplicate Claims:** Defined as two or more Claims that are submitted with (1) the same name and address, or (2) the same name and email address.

9. **High Confidence Fraud Claims:** Consist of Claims that exhibit known characteristics of automated Claim submissions and other indicators of fraud. These characteristics include submissions where (1) the same IP address appears up to 1,380 times, (2) Claims identified by AI algorithms as verified or suspected bot submissions, (3) the email address associated with the Claim is either included in a database maintained by EisnerAmper or its partners of known fraudulent email addresses or registered with a foreign Email Service Provider

and the claimant has elected to receive a settlement payment as a digital payment to the known fraudulent email, (4) the IP address 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 paid using the same digital payment account information. Many of the Claims identified as high confidence fraud exhibit multiple characteristics described above. High confidence fraud Claims will be denied.

10. **Claim Verification Notice.** If any Claim is identified as requiring further information to confirm the validity of the submission, EisnerAmper will send a notice to each such 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 in the notice will be denied. Claimants will have 30 days to complete the verification process. EisnerAmper will send a reminder email to those claimants who have not verified their Claim at least seven (7) days prior to the deadline.

Notice and Administration Costs

11. As of October 3, 2025, EisnerAmper has incurred \$249,992.96 in fees and costs completing the Notice Plan and administering the Settlement and anticipates incurring \$66,774.35 in additional fees and costs through the conclusion of this matter for a total cost of \$316,737.31.

Settlement Fund Summary

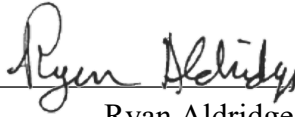
12. Based on the claims numbers described above, we estimate that each approved Claimant will receive approximately \$285 to \$315, depending on a variety of factors including the Court's award of attorney fees, expenses, service payments, administration expenses, and the final number of valid claims received.

Certification

I, Ryan Aldridge, declare under penalty of perjury that the foregoing is true and correct to

the best of my knowledge and belief.

Executed this 7th day of October 2025 in Baton Rouge, Louisiana.


Ryan Aldridge