

EXHIBIT A

3. As mentioned in my previous declaration, ECF No. 137-3, Kroll has extensive experience in class-action disputes, having provided services in class-action settlements involving antitrust, securities fraud, employment and labor, consumer, and government-enforcement matters. Kroll has provided class-action services in more than 3,000 settlements varying in size and complexity over the past 45 years. During that time, Kroll has distributed hundreds of millions of notices and billions of dollars in settlement funds and judgment proceeds to class members and claimants.

4. On March 26, 2021, Kroll sent 164,851 short-form notices previously approved by the Court, ECF No. 138, 141, to Class Members, using data provided by Defendants. Jackson Decl. ¶ 5. Kroll conformed to the approved notice plan in its entirety. Before sending the notices, the names and addresses provided by Defendants were processed through the National Change of Address database to update any changes of address on file with the United States Postal Service (“USPS”). When a short-form notice was returned as undeliverable with a forwarding address, Kroll re-mailed the notice to the forwarding address. When a return arrived without a forwarding address, Kroll employed the tools of the USPS to obtain a current address. 11,811 notices were returned as undeliverable; additional addresses for these Class Members were researched, and 856 notices were mailed to new addresses.

5. The long- and short-form notices direct recipients to a dedicated settlement website, www.WithdrawalChargeSettlement.com. More than 14,000 people have visited the website, resulting in visits to 43,000 pages. The website explains in full the details about the Settlement and options available to Class Members. The website also allows Class Members to view important documents, to elect a payment method, and to update their contact information. As of April 26,

2021, the website has received more than 5,730 online payment elections and contact updates and continues to receive more each day.

6. At the request of and with Class Counsel, Kroll is in the process of performing further outreach via email and mail to certain Class Members who have a larger interest in the settlement. These Class Members are those who are likely entitled to receive more than \$100 in compensation based on current recovery estimates. This group's benefit corresponds to approximately 48% of the settlement proceeds to be distributed.

7. Kroll also set up a call center that is prominently referenced on the website. From March 6, 2021, when the toll-free number was activated, through today, Kroll has received 3,301 calls to the interactive voice response ("IVR") system. Of those callers, 1,753 requested to speak to a live operator, and a trained Kroll representative handled the call. Kroll also set up a case-dedicated email address. Class Members can update their contact information through the representative, just as they can on the website.

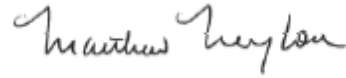
8. Kroll continues to coordinate with both parties' counsel to address Class Member questions and other issues. For example, certain Class Members are deceased, and beneficiaries and estate representatives have inquired about the proper recipient of the settlement funds. Additionally, some Class Members' statuses have changed from current account holder to former account holder.

9. As of April 26, 2021, Kroll has not received any requests to opt out of the settlement.

10. As of April 26, 2021, Kroll has not received any objections to the settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 27th day of April, 2021 in La Grange, KY.

A handwritten signature in cursive script that reads "Matthew Neylon".

Matthew Neylon