

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: NETGAIN TECHNOLOGY, LLC, CONSUMER DATA BREACH LITIGATION	Court File No. 21-cv-1210 (SRN/LIB)
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**SUPPLEMENTAL DECLARATION OF JENNIFER FORST ON BEHALF OF CPT
GROUP, INC. REGARDING SETTLEMENT ADMINISTRATION AND IN SUPPORT
OF PLAINTIFFS’ UNOPPOSED MOTION FOR FINAL APPROVAL OF
SETTLEMENT**

I, Jennifer Forst, declare and state as follows:

1. I am a Supervising Case Manager for CPT Group, Inc. (“CPT”), the Settlement Administrator jointly agreed upon by the Parties and approved by the Court In re Netgain Technology, LLC Consumer Data Breach Litigation. The following statements are based on my personal knowledge, information provided to me by counsel for the Parties, by other CPT employees working on this matter, and records of CPT generated and maintained in the usual course of its business. If called on to do so, I could and would testify competently thereto. I submit this declaration in support of the Parties’ Motion for Final Approval of Class Action Settlement.

2. CPT has extensive experience in providing notice of class actions and administering class action settlements. In the past 30-plus years, we have provided notification and/or settlement administration services in thousands of class action cases.

3. I submit this Supplemental Declaration to update my prior Declaration dated September 30, 2025.

CLAIMS ANALYSIS

4. As of the date of this declaration, CPT has received a total of 704,551 claims. These include 102 claims for Documented Losses, 455,954 claims for Lost Time, and 248,559 claims for Alternative Cash Payments.

5. Due to the unusually large number of claims, Settlement Class Counsel asked CPT to analyze the submitted claims for indicia of fraud.

6. CPT engaged ClaimScore to evaluate the claims submissions for fraud.

ClaimScore is a legal technology company that provides complex data analysis and pattern recognition services that assist claims administrators in identifying fraudulent claims in class action settlements. Their proprietary advanced AI analysis incorporates real-time pattern recognition, multi-source data enrichment, and intelligent rule-weighting informed by machine learning. ClaimScore provides informed recommendations on claim validity where each claim is individually evaluated based on a 65+ point expert-system artificial intelligence algorithm. As a result of ClaimScore's analysis, 5,438 claims were preliminarily approved as valid and 699,017 were determined to be fraudulent and therefore, invalid.

7. Next, CPT completed its validation process on the analyzed claims, as well as the 96 claims received after the ClaimScore analysis was completed. Of the 5,438 preliminarily approved claims, CPT invalidated 23 claims due to being duplicate or frequent fraudulent filer submissions. Frequent fraudulent filers are claimants identified as repeat offenders in the CPT-maintained database. Of the claims CPT reviewed that were submitted after the ClaimScore analysis, 70 were deemed valid.

8. As of the date of this declaration, CPT reports 5,485 valid claims. Of the 5,485 valid claims, 51 have claimed Documented Losses, 1,363 claimed Lost Time and 4,105 claimed the Alternative Cash Payment.

9. Based on the valid claim rate, CPT will set aside \$8,500.00, or approximately 1% of the Net Settlement Fund, as a Reserve Fund to ensure any claimants who successfully appeal or dispute their eligibility receive an award pursuant to the Settlement.

10. After deduction of the requested Attorney Fees and Expenses (which are subject to the Court's approval), Lead Plaintiff Awards, CPT's administration fees and the Reserve Fund, the estimated Net Settlement Fund is \$775,905.15.

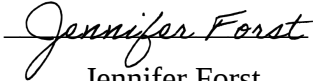
Gross Settlement Amount	\$1,900,000.00
Attorney Fees	\$633,333.33
Attorney Expenses	\$48,261.52
Service Awards	\$9,000.00
CPT Fees	\$425,000.00
Reserve Fund	\$8,500.00
Net Settlement Fund	\$775,905.15

The estimated award amount per claim category is as follows:

- 51 Documented valid Loss claims = \$102,995.55
- 1,363 valid Lost Time claims = \$101,050.00
- 4,105 valid Alternative Cash Payment claims = \$571,859.60
 - Estimated \$139.31 per individual Alternative Cash Payment claim.

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

Executed on October 27, 2025, at Irvine, California.


Jennifer Forst