

Exhibit 1

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3
4 *In Re: Robinhood Outage Litigation*

Case No. 3:20-cv-01626-JD

CLASS ACTION

6
7 **SUPPLEMENTAL DECLARATION OF CAMERON R. AZARI, ESQ. REGARDING NOTICE PLAN**

8 I, Cameron R. Azari, Esq., hereby declare and state as follows:

9 1. My name is Cameron Azari. I have personal knowledge of the matters set forth herein, and
10 I believe them to be true and correct.

11 2. I am a nationally recognized expert in the field of legal notice and have served as an expert
12 in hundreds of federal and state cases involving class action notice plans.

13 3. I am the Senior Vice-President of Epiq Class Action and Claims Solutions, Inc. (“Epiq”) and
14 the Director of Legal Notice for Hilsoft Notifications, a firm that specializes in designing, developing,
15 analyzing, and implementing large-scale, un-biased, legal notification plans. Hilsoft Notifications is a
16 business unit of Epiq. References to Epiq in this declaration include Hilsoft Notifications.

17 4. I previously executed my *Declaration of Cameron R. Azari, Esq. on Notice Plan and*
18 *Notices*, on August 4, 2022, which described the Settlement Notice Plan (“Notice Program” or “Notice
19 Plan”) and notice (the “Notice” or “Notices”) proposed here for *In re Robinhood Outage Litigation*, Case
20 No. 3:20-cv-01626-JD in the United States District Court for the Northern District of California. In my
21 declaration, I detailed Epiq’s designed of the Notice Plan based on our extensive prior experience and
22 research into the notice issues particular to this case. We analyzed and proposed the most effective
23 method practicable of providing notice to the Settlement Class. I also detailed Hilsoft’s class action notice
24 experience, attached Hilsoft’s curriculum vitae, and provided my educational and professional experience
25 relating to class actions and my ability to render opinions on overall adequacy of notice programs.

26 5. The facts in this declaration are based on my personal knowledge, as well as information
27 provided to me by my colleagues in the ordinary course of my business at Epiq.

1 6. It is my understanding from Class Counsel and from my review of the Transcript of
2 Proceedings before the Honorable James Donato, United States District Judge (“Hearing Transcript”) of
3 the Preliminary Approval Court Hearing on September 8, 2022, that the Court inquired regarding Epiq’s
4 data security and privacy safeguards in its official capacity as Settlement Administrator. In particular, the
5 Court requested information to confirm Epiq’s compliance with the N.D. Cal. Procedural Guidance for
6 Class Action Settlements, Preliminary Approval, Settlement Administration (2)(b) (articulating best
7 practices and procedures regarding settlement administrator’s procedures for securely handling class
8 member data, etc.), which were recently updated.¹

9 7. It is also my understanding from reviewing the Hearing Transcript that the Court prefers here
10 that a summary Postcard Notice be mailed to Settlement Class Members rather than mailing the 11-page
11 Long Form Notice, as originally requested by counsel for the parties. I concur with the Court that sending
12 a Postcard Notice instead of the lengthy Long Form Notice will still achieve the best notice practicable, and
13 at a fraction of the cost with the reduced cost of postage alone. The Postcard Notice will provide important
14 summary information regarding the Settlement and will direct Settlement Class Members to the Settlement
15 Website where they can obtain more detailed information, including the Long Form Notice.

16 **DATA PRIVACY AND SECURITY**

17 8. Epiq has procedures in place to protect the security of class data. As with all cases, Epiq
18 will maintain extensive data security and privacy safeguards in its official capacity as the Settlement
19 Administrator for this Action. A *Services Agreement*, which formally retains Epiq as the Settlement
20 Administrator, will govern Epiq’s Settlement Administration responsibilities for the Action. Service
21 changes or modification beyond the original contract scope will require formal contract addendum or
22 modification. Epiq maintains adequate insurance in case of errors

23 9. As a data processor, Epiq performs services on data provided, only as those outlined in a
24 contract and/or associated statement(s) of work. Epiq does not utilize or perform other procedures on
25 personal data provided or obtained as part of its services to a client. All data provided directly to Epiq
26

27 _____

28 ¹ N.D. Cal. Procedural Guidance for Class Action Settlements, published November 1, 2018; modified December 5, 2018, and August 4, 2022.

1 will be used solely for the purpose of effecting the terms of the Settlement Agreement. Epiq will not use
2 such information or information to be provided by Settlement Class Members for any other purpose than
3 the administration of the Settlement in this Action, specifically the information will not be used,
4 disseminated, or disclosed by or to any other person for any other purpose.

5 10. The security and privacy of clients' and class members' information and data are paramount
6 to Epiq. That is why Epiq has invested in a layered and robust set of trusted security personnel, controls,
7 and technology to protect the data we handle. To promote a secure environment for client and class
8 member data, industry leading firewalls and intrusion prevention systems protect and monitor Epiq's
9 network perimeter with regular vulnerability scans and penetration tests. Epiq deploys best-in-class
10 endpoint detection, response, and anti-virus solutions on our endpoints and servers. Strong authentication
11 mechanisms and multi-factor authentication are required for access to Epiq's systems and the data we
12 protect. In addition, Epiq has employed the use of behavior and signature-based analytics as well as
13 monitoring tools across our entire network, which are managed 24 hours per day, 7 days per week, by a
14 team of experienced professionals.

15 11. Epiq's world class data centers are defended by multi-layered, physical access security,
16 including formal ID and prior approval before access is granted, CCTV, alarms, biometric devices, and
17 security guards, 24 hours per day, 7 days per week. Epiq manages minimum Tier 3+ data centers in 18
18 locations worldwide. Our centers have robust environmental controls including UPS, fire detection and
19 suppression controls, flood protection, and cooling systems.

20 12. Beyond Epiq's technology, our people play a vital role in protecting class members' and our
21 clients' information. Epiq has a dedicated information security team comprised of highly trained,
22 experienced, and qualified security professionals. Our teams stay on top of important security issues and
23 retain important industry standard certifications, like SANS, CISSP, and CISA. Epiq is continually
24 improving security infrastructure and processes based on an ever-changing digital landscape. Epiq also
25 partners with best-in-class security service providers. Our robust policies and processes cover all aspects
26 of information security to form part of an industry leading security and compliance program, which is
27 regularly assessed by independent third parties.

28 13. Epiq holds several industry certifications including: TISAX, Cyber Essentials, Privacy

1 Shield, and ISO 27001. In addition to retaining these certifications, we are aligned to HIPAA, NIST, and
2 FISMA frameworks. We follow local, national, and international privacy regulations. To support our
3 business and staff, Epiq has a dedicated team to facilitate and monitor compliance with privacy policies.
4 Epiq is also committed to a culture of security mindfulness. All employees routinely undergo
5 cybersecurity trainings to ensure that safeguarding information and cybersecurity vigilance is a core
6 practice in all aspects of the work our teams complete.

7 14. Upon completion of a project, Epiq continues to host all data until otherwise instructed in
8 writing by a customer to delete, archive or return such data. When a customer requests that Epiq delete
9 or destroy all data, Epiq agrees to delete or destroy all such data; provided, however, that Epiq may retain
10 data as required by applicable law, rule or regulation, and to the extent such copies are electronically
11 stored in accordance with Epiq's record retention or back-up policies or procedures (including those
12 regarding electronic communications) then in effect. Epiq keeps data in line with client retention
13 requirements. If no retention period is specified, Epiq returns the data to the client or securely deletes as
14 appropriate.

15 **NOTICE PLAN METHODOLOGY**

16 15. Federal Rule of Civil Procedure, Rule 23 directs that notice must be "the best notice that is
17 practicable under the circumstances, including individual notice to all members who can be identified
18 through reasonable effort" and that "the notice may be by one or more of the following: United States
19 mail, electronic means, or other appropriate means."² The proposed Notice Plan will satisfy these
20 requirements.

21 16. This proposed Notice Plan is designed to reach the greatest practicable number of members
22 of the Settlement Class. Given our experience with similar notice efforts, we expect that the proposed
23 Notice Plan notice efforts will reach more than 95% of the identified members of the Settlement Class via
24 email and/or mailed notice and digital notice. The reach will be further enhanced by internet sponsored
25 search and a Settlement Website. In my experience, the projected reach of the Notice Plan is consistent
26 with other court-approved notice plans, is the best notice practicable under the circumstances of this case,
27

28 ² Fed. R. Civ. P. 23(c)(2)(B).

1 and has been designed to satisfy the requirements of due process, including its “desire to actually inform”
2 requirement.³

3 17. Data sources and tools that are commonly employed by experts in this field were used to
4 analyze and develop the media portion of this Notice Plan. These include MRI-Simmons⁴ data, which
5 provides statistically significant readership and product usage data and Comscore.⁵ These tools, along
6 with demographic breakdowns indicating how many people use each media vehicle, as well as computer
7 software that take the underlying data and factor out the duplication among audiences of various media
8 vehicles, allow us to determine the net (unduplicated) reach of a particular mailing and media schedule.
9 We combine the results of this analysis to help determine notice plan sufficiency and effectiveness.

10 18. *Tools and data trusted by the communications industry and courts.* Virtually all the
11 nation’s largest advertising agency media departments utilize, scrutinize, and rely upon such independent,
12 time-tested data and tools, including net reach and de-duplication analysis methodologies, to guide the
13 billions of dollars of advertising placements that we see today, providing assurance that these figures are

14
15 ³ *Mullane v. Cent. Hanover Bank & Trust Co.*, 339 U.S. 306, 315 (1950) (“But when notice is a person’s
16 due, process which is a mere gesture is not due process. The means employed must be such as one desirous
17 of actually informing the absentee might reasonably adopt to accomplish it. The reasonableness and hence
18 the constitutional validity of any chosen method may be defended on the ground that it is in itself reasonably
19 certain to inform those affected . . .”); *see also In re Hyundai & Kia Fuel Econ. Litig.*, 926 F.3d 539, 567
20 (9th Cir. 2019) (“To satisfy Rule 23(e)(1), settlement notices must ‘present information about a proposed
21 settlement neutrally, simply, and understandably.’ ‘Notice is satisfactory if it generally describes the terms
22 of the settlement in sufficient detail to alert those with adverse viewpoints to investigate and to come forward
23 and be heard.’”) (citations omitted); N.D. Cal. Procedural Guidance for Class Action Settlements,
24 Preliminary Approval (3) (articulating best practices and procedures for class notice).

21 ⁴ MRI-Simmons is a leading source of publication readership and product usage data for the
22 communications industry. MRI-Simmons is the new name for the joint venture of GfK Mediamark
23 Research & Intelligence, LLC (“MRI”) and Simmons Market Research. MRI-Simmons offers
24 comprehensive demographic, lifestyle, product usage and exposure to all forms of advertising media
25 collected from a single sample. As the leading U.S. supplier of multimedia audience research, the
26 company provides information to magazines, televisions, radio, Internet, and other media, leading national
27 advertisers, and over 450 advertising agencies—including 90 of the top 100 in the United States. MRI-
28 Simmons’s national syndicated data is widely used by companies as the basis for the majority of the media
and marketing plans that are written for advertised brands in the U.S.

⁵ Comscore is a global Internet information provider on which leading companies and advertising agencies
rely for consumer behavior insight and Internet usage data. Comscore maintains a proprietary database
of more than two million consumers who have given comScore permission to monitor their browsing and
transaction behavior, including online and offline purchasing. Comscore panelists also participate in
survey research that captures and integrates their attitudes and intentions.

1 not overstated. These analyses and similar planning tools have become standard analytical tools for
2 evaluations of notice programs and have been regularly accepted by courts.

3 19. In fact, advertising and media planning firms around the world have long relied on audience
4 data and techniques: 90 to 100% of media directors use reach and frequency planning;⁶ all the leading
5 advertising and communications textbooks cite the need to use reach and frequency planning.⁷ Ninety of
6 the top one hundred media firms use MRI data, and Comscore is used by the major holding company
7 agencies worldwide which includes Dentsu Aegis Networking, GroupM, IPG and Publicis, in addition to
8 independent agencies for TV and digital media buying and planning, and at least 25,000 media
9 professionals in 100 different countries use media planning software.

10 20. **Demographics.** In selecting media to target to the Settlement Class, the demographics of
11 likely members of the Settlement Class were analyzed. According to MRI-Simmons syndicated media
12 research, people who use Robinhood have the following demographics:

- 13 • 52.5% of Robinhood users are aged 18-34;
- 14 • 82.1% of Robinhood users are aged 18-49;
- 15 • 63.4% are on *Facebook*;
- 16 • Are 37% more likely to be on *Instagram* than the average adult; and
- 17 • 89.4% are on any social networking site.

NOTICE PLAN DETAIL

18 21. The Notice Plan was designed to provide notice to the following “Settlement Class” as
19 defined in the Settlement Agreement as:

20 [A]ll Robinhood accountholders in the United States who: (i) closed a position on
21 March 3, 2020, at a loss relative to the Volume Weighted Average Price (“VWAP”)
22 during the March 2 and 3, 2020 Outages; (ii) held SPDR S&P 500 options expiring on
23 March 2, 2020 and experienced a loss relative to the VWAP during the March 2, 2020
24 Outage; (iii) who experienced a Failed Equity Trade during the March 2 and 3 Outages
25 at a loss relative to the price at the end of the March 2 and 3 Outages and/or the
26 transaction price obtained through March 4, 2020; or (iv) who experienced a Failed
27 Equity Trade during the March 9 Outage at a loss relative to the price at the end of the
28 March 9 Outage and/or the transaction price obtained through March 10, 2020.

Excluded from the Settlement Class are Defendants and their legal representatives,

1 heirs, successors or assigns. Also excluded from the Settlement Class are Persons
2 who have entered into settlement agreements with Robinhood, outside of the
Goodwill Program, that include a release of claims related to the Outages.

3 **NOTICE PLAN**

4 ***Individual Notice***

5 22. It is my understanding from Counsel for the Parities that Epiq will receive data for virtually
6 all members of the Settlement Class, which will include names, email addresses, and mailing addresses.
7 Epiq will also receive trading information for members of the Settlement Class. Identified members of
8 the Settlement Class for whom a physical mailing address is available will be mailed a summary Postcard
9 Notice (“Mailed Notice”). The Mailed Notice will be mailed via United States Postal Service (“USPS”)
10 first-class mail. In addition, identified members of the Settlement Class for whom a valid email address
11 is available will be sent an individualized version of the Long Form Notice (“Email Notice”) that provides
12 each Settlement Class Member with access to their anticipated Settlement Payment information. The
13 Mailed Notice and Email Notice will clearly describe the case, the Settlement and Plan of Allocation, and
14 the legal rights of the members of the Settlement Class. In addition, the Notices will also direct the
15 recipients to the Settlement Website where they can access additional information.

16 ***Individual Notice – Email***

17 23. Epiq will email the Notice to all identified members of the Settlement Class for whom a
18 valid email address is available. The following industry standard best practices will be followed for the
19 email efforts. The Notices will be sent from an IP address known to major email providers as one not
20 used to send bulk “SPAM” or “junk” email blasts. Each Notice will be transmitted with a digital signature
21 to the header and content of the Notice, which will allow ISPs to programmatically authenticate that the
22 Notices are from our authorized mail servers. Each Notice will also be transmitted with a unique message
23 identifier. The Notice will include an embedded link to the Settlement Website. By clicking the link,
24 recipients will be able to access the Settlement Agreement and other information about the Settlement.

25 24. If the receiving email server cannot deliver the message, a “bounce code” will be returned
26 along with the unique message identifier. For any Notice sent my email for which a bounce code is
27 received indicating that the message was undeliverable for reasons such as an inactive or disabled account,
28 the recipient’s mailbox was full, technical autoreplies, etc., at least two additional attempts will be made

1 to deliver the Notice by email.

2 ***Individual Notice – Direct Mail***

3 25. Epiq will send a Mailed Notice (Postcard Notice) via USPS first class mail to all identified
4 members of the Settlement Class with an associated physical address. Prior to sending the Mailed Notice,
5 all mailing addresses will be checked against the National Change of Address (“NCOA”) database
6 maintained by the USPS to ensure the address information is up-to-date and accurately formatted for
7 mailing.⁸ In addition, the addresses will be certified via the Coding Accuracy Support System (“CASS”) to
8 ensure the quality of the zip code, and will be verified through Delivery Point Validation (“DPV”) to
9 verify the accuracy of the addresses. This address updating process is standard for the industry and for
10 the majority of promotional mailings that occur today.

11 26. The return address on the Mailed Notices will be a post office box that Epiq will maintain for
12 this case. The USPS will automatically forward Mailed Notices with an available forwarding address order
13 that has not expired (“Postal Forwards”). Mailed Notices returned as undeliverable will be re-mailed to any
14 new address available through USPS information, (for example, to the address provided by the USPS on
15 returned mail pieces for which the automatic forwarding order has expired, but is still within the time period
16 in which the USPS returns the piece with the address indicated), and to better addresses that may be found
17 using a third-party lookup service. Upon successfully locating better addresses, Mailed Notices will be
18 promptly remailed.

19 ***Media Plan***

20 ***Internet Notice Campaign***

21 27. Internet advertising has become a standard component in legal notice programs. The internet
22 has proven to be an efficient and cost-effective method to target and provide measurable reach of persons
23 covered by a settlement. According to MRI Simmons data, 97.3% of all adults are online.⁹

24 _____
25 ⁸ The NCOA database is maintained by the USPS and consists of approximately 160 million permanent
26 change-of-address (“COA”) records consisting of names and addresses of individuals, families, and
27 businesses who have filed a change-of-address with the Postal Service™. The address information is
28 maintained on the database for 48 months and reduces undeliverable mail by providing the most current
address information, including standardized and delivery-point-coded addresses, for matches made to the
NCOA file for individual, family, and business moves.

⁹ MRI-Simmons Spring 2022 Survey of the American Consumer®.

28. The Notice Plan includes targeted Digital Notice using a “list activation” strategy via the *Google Display Network*, *Facebook*, and *Instagram*. This will be accomplished by matching the actual email addresses of identified members of the Settlement Class with current consumer profiles. This strategy ensures that specific individuals receiving direct notice will also be provided reminder messaging online via Digital Notices.

29. The Digital Notices will link directly to the Settlement Website, thereby allowing visitors easy access to relevant information and documents. Consistent with common practice, the Digital Notices will use language from the notice headline, which will allow users to identify themselves as potential members of the Settlement Class. All Digital Notices will appear on desktop, mobile, and tablet devices and will be distributed to the selected targeted audiences nationwide. Internet Digital Notices will also be targeted (remarketed) to people who visit the Settlement Website after clicking on a Notice.

30. More details regarding the targeting, distribution, and specific ad sizes of the Digital Notices are included in the following table.

<i>Network/Property</i>	<i>Target</i>	<i>Ad Sizes</i>	<i>Targeted Impressions</i>
<i>Google Display Network</i>	List Activation for 175k email addresses	728x90, 300x250, 300x600, 970x250	2,000,000
<i>Facebook</i>	List Activation for 175k email addresses	Newsfeed & Right Hand Column	2,000,000
<i>Instagram</i>	List Activation for 175k email addresses	Instagram Feed Ads	2,000,000
TOTAL			6,000,000

31. Combined, more than 6 million impressions will be generated by the Digital Notices, nationwide.¹⁰ The internet advertising campaign will run for approximately 31 days. Clicking on the Digital Notices will link the reader to the Settlement Website, where the reader can easily obtain detailed information about the Settlement. Examples of the proposed Digital Notices are included as **Attachment 1**.

¹⁰ The third-party ad management platform, ClickCease, will be used to audit any digital Banner Notice ad placements. This type of platform tracks all Banner Notice ad clicks to provide real-time ad monitoring, fraud traffic analysis, blocks clicks from fraudulent sources, and quarantines dangerous IP addresses. This helps reduce wasted, fraudulent, or otherwise invalid traffic (e.g., ads being seen by ‘bots’ or non-humans, ads not being viewable, etc.).

1 ***Internet Sponsored Search Listings***

2 32. To facilitate locating the Settlement Website, sponsored search listings will be acquired
3 online through the highly visited internet search engines: *Google, Yahoo!*, and *Bing*. When search engine
4 visitors search on common keyword combinations to identify the Settlement, the sponsored search listing
5 generally will be displayed at the top of the page prior to the search results or in the upper right-hand
6 column of the web-browser screen. A list of keywords will be developed in conjunction with Counsel.
7 The sponsored search listings will be displayed nationwide. All sponsored search listings will link directly
8 to the Settlement Website.

9 ***Settlement Website***

10 33. Epiq will create and maintain a dedicated website for the Settlement with the domain name
11 of www.RobinhoodOutagesClassAction.com. Relevant documents, including the Long Form Notice,
12 Settlement Agreement, Complaint, Motion for Preliminary Approval, Preliminary Approval Order once
13 entered by the Court, and after filing, Motion for Attorneys' Fees and Costs and Service Awards, and
14 Motion for Final Approval will be posted on the Settlement Website. In addition, the Settlement Website
15 will include relevant dates, answers to frequently asked questions ("FAQs"), instructions for how
16 Settlement Class Members may opt-out (request exclusion) from or object to the Settlement, contact
17 information for the Settlement Administrator, and how to obtain other case-related information. The
18 Settlement Website address will be prominently displayed in all notice documents.

19 ***Toll-Free Number and Other Contact Information***

20 34. A toll-free telephone number will also be established for the Settlement. Callers will be able
21 to hear an introductory message and will also have the option to learn more about the Settlement in the
22 form of recorded answers to FAQs. This automated phone system will be available 24 hours per day,
23 7 days per week. During normal business hours, callers will also be able to talk with a live agent. The
24 toll-free telephone number will be prominently displayed in all notice documents.

25 35. A postal mailing address will be established, providing members of the Settlement Class
26 with the opportunity to request additional information or ask questions.

27 ***Distribution Options***

28 36. It is my understanding from counsel for the parties, that Robinhood will be able to make

1 automated deposits to Settlement Class Members with an open Robinhood account. This will be the
2 default method of payment to Settlement Class Members. For those Settlement Class Members without
3 an open Robinhood account, the Settlement Class Members will have the option to receive their
4 Settlement Payment pursuant to the terms of this Settlement Agreement *via* digital methods (i.e., PayPal,
5 Venmo, *etc.*). In the event the Settlement Class Members do not exercise this option, they will receive
6 their Settlement Payment *via* a physical check sent by USPS first class mail.

7 ***Estimated Costs***

8 37. Based on a projected 175,000 Settlement Class Members, and assuming 5% undeliverable
9 mail and email, and assuming a minimum of 80% digital payments and assuming a case duration of nine
10 months, we provided counsel with an estimated cost of administration of \$218,433.

12 **CONCLUSION**

13 38. In class action notice planning, execution, and analysis, we are guided by due process
14 considerations under the United States Constitution, by federal and local rules and statutes, and further by
15 case law pertaining to notice. This framework directs that the notice plan be designed to reach the greatest
16 practicable number of potential class members and, in a settlement class action notice situation such as
17 this, that the notice or notice plan itself not limit knowledge of the availability of benefits—nor the ability
18 to exercise other options—to class members in any way. All of these requirements will be met in this
19 case.

20 39. The Notice Plan includes an extensive individual notice effort to virtually all members of
21 the Settlement Class. Given our experience with similar notice efforts, we expect that the proposed Notice
22 Plan notice efforts will reach more than 95% of the identified members of the Settlement Class via email
23 and/or mailed notice and digital notice. The reach will be further enhanced by internet sponsored search
24 and a Settlement Website.

25 40. The FJC's Judges' Class Action Notice and Claims Process Checklist and Plain Language
26 Guide states that "the lynchpin in an objective determination of the adequacy of a proposed notice effort
27 is whether all the notice efforts together will reach a high percentage of the Settlement Class. It is
28

1 reasonable to reach between 70–95%.”¹¹ Here, the Notice Plan we have developed will achieve a reach
2 at the high end of that standard.

3 41. The Notice Plan follows the guidance for satisfying due process obligations that a notice
4 expert gleans from the United States Supreme Court’s seminal decisions, which emphasize the need: (a)
5 to endeavor to actually inform the Settlement Class, and (b) to ensure that notice is reasonably calculated
6 to do so:

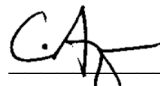
- 7 a) “[W]hen notice is a person’s due, process which is a mere gesture is not due
8 process. The means employed must be such as one desirous of actually informing
9 the absentee might reasonably adopt to accomplish it,” *Mullane v. Central
10 Hanover Trust*, 339 U.S. 306, 315 (1950); and
11 b) “[N]otice must be reasonably calculated, under all the circumstances, to apprise
12 interested parties of the pendency of the action and afford them an opportunity to
13 present their objections,” *Eisen v. Carlisle & Jacquelin*, 417 U.S. 156 (1974)
14 (citing *Mullane*, 339 U.S. at 314).

15 42. The Notice Plan in this case will provide the best notice practicable under the circumstances,
16 conform to all aspects of Federal Rule of Civil Procedure Rule 23 regarding notice and the N.D. Cal.
17 Procedural Guidance for Class Action Settlements, comport with the guidance for effective notice
18 articulated in the Manual for Complex Litigation, Fourth and applicable FJC materials, and exceed the
19 requirements of due process, including its “desire to actually inform” requirement.

20 43. The Notice Plan schedule will afford enough time to provide full and proper notice to the
21 members of the Settlement Class before any opt-out and objection deadlines.

22 44. At the conclusion of the Notice Plan, I will provide a declaration verifying the effective
23 implementation of the Notice Plan.

24 I declare under penalty of perjury that the foregoing is true and correct. Executed October 7, 2022.

25 

26 _____
Cameron R. Azari, Esq.

27 ¹¹ FED. JUDICIAL CTR., JUDGES’ CLASS ACTION NOTICE AND CLAIMS PROCESS CHECKLIST AND PLAIN
28 LANGUAGE GUIDE 3 (2010), available at <https://www.fjc.gov/content/judges-class-action-notice-and-claims-process-checklist-and-plain-language-guide-0>.

Attachment 1

Robinhood Outage Litigation Banner Advertisement

300 x 250 Online Display Banner

Frame 1 (on screen for 7 seconds):



Frame 2 (on screen for 7 seconds):



Facebook Newsfeed Ad (Static)

The ad is a static image for a Facebook Newsfeed. At the top left is the Epiq logo with the text "Epiq Sponsored". To the right are three dots and a close button. Below this is the text: "Robinhood customers affected by the March 2020 trading outages may receive benefits." The main visual is a hand holding a smartphone. The phone screen shows a trading interface with a candlestick chart, a blue line graph, and "SELL" and "BUY" buttons. The background is dark blue with faint "shutterstock" watermarks. Below the image is a link: "www.robinhoodoutagesclass...", followed by the text "Robinhood Outages Settlement" and a "Learn more" button. At the bottom are icons for "Like", "Comment", and "Share".

Facebook Right Hand Column Ad (Static)

The ad is a static image for a Facebook Right Hand Column. It features a small version of the trading app interface on a smartphone held in a hand, set against a dark blue background with "shutterstock" watermarks. To the right of the image, the text reads: "Robinhood Outages Settlement" and "www.robinhoodoutagesclassaction.com".

Instagram Newsfeed Ad
(Static)

