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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF TULARE**

DAVID UNDERWOOD and DUNCAN MEADOWS,  
individually and on behalf of all others similarly  
situated,

Plaintiffs,

v.

HAPY BEAR SURGERY CENTER, LLC  
Defendant.

Case No. VCU307987

**DECLARATION OF RYAN ALDRIDGE  
REGARDING PROPOSED NOTICE  
PLAN AND ADMINISTRATION**

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

2 1. I am a Project Manager for the proposed Settlement Administrator, Eisner Advisory Group,  
3 LLC (“EAG” or “EisnerAmper”), a full-service administration firm providing legal administration services,  
4 including the design, development, and implementation of unbiased complex legal notification programs.  
5 We were asked by Counsel to review and execute the proposed Notice Plan in the above-referenced matter  
6 (the “Action”)<sup>1</sup>. The following statements are based on my personal knowledge as well as information  
7 provided by other experienced employees working under my supervision.

8 2. We have undertaken the creation and execution of notice plans, along with the administration  
9 of diverse class action and mass action settlements. Our expertise extends across a wide array of subject  
10 matters, encompassing but not limited to privacy, products liability, consumer rights, mass tort, antitrust,  
11 insurance, and healthcare. The accomplished members of our team possess extensive experience in the design  
12 and implementation of notice procedures involving various aspects of class certification and settlement  
13 programs.

14 **OVERVIEW**

15 3. Based on our review of the Settlement Agreement, the Settlement Class is defined as follows:

16 **Nationwide Class:** All persons whose personal identification information and data was stored in  
17 HBSC’s systems at the time of the December 27, 2023 cybersecurity incident and who were impacted  
18 by the cybersecurity incident. HBSC has confirmed that the number of Class Members impacted by  
the December 27, 2023 cybersecurity incident is 109,161 individuals.

19 **California Subclass:** All members of the Nationwide Class who are also California residents at the  
20 time of the December 27, 2023 cybersecurity incident. HBSC has confirmed that the number of  
California residents at the time of the cybersecurity incident is 108,946 individuals.

21 Excluded from the Settlement Class are HBSC’s officers, directors, and employees; any entity in which  
22 HBSC has a controlling interest; and the affiliates, legal representatives, attorneys, successors, heirs, and  
23 assigns of HBSC. Excluded also from the Settlement Class are members of the judiciary to whom this case  
24 is assigned, their families and members of their staff. Also excluded from the Settlement Class are non-  
25 natural persons.

26 \_\_\_\_\_  
27 <sup>1</sup> All capitalized terms not otherwise defined in this document shall have the meaning ascribed to them in the  
28 Settlement Agreement.



1 **Settlement Website**

2 7. We will create and maintain a website, [www.HBSCDataSecurityIncident.com](http://www.HBSCDataSecurityIncident.com), dedicated to  
3 this Settlement. The website address will be prominently included in the Short and Long Notice (collectively,  
4 the “Notices”). The Notices, along with other relevant documents such as the Preliminary Approval Order,  
5 the Settlement Agreement, and Claim Form, will be posted on the Settlement Website for Class Members to  
6 review and download. The Settlement Website will also allow Class Members to file a claim electronically,  
7 and include relevant dates, other case-related information, instructions for how to be excluded from the Class  
8 or object to the Settlement and contact information for the Settlement Administrator.

9 **Dedicated Toll-Free Hotline**

10 8. A dedicated toll-free informational hotline will be available 24 hours per day, seven days per  
11 week. The hotline will utilize an interactive voice response (“IVR”) system where Class Members can obtain  
12 essential information regarding the Settlement and be provided responses to frequently asked questions. Class  
13 Members will also have the option to leave a voicemail and receive a call back from the Claims  
14 Administrator.

15 **Requests for Exclusion**

16 9. Class Members that want to exclude themselves from the Class may submit a request for  
17 exclusion by mail to a dedicated Post Office Box that we will maintain. We will monitor all mail delivered  
18 to that Post Office Box and will track all exclusion requests received, which will be provided to the Parties.

19 **CONCLUSION**

20 10. The proposed Notice Plan encompasses individualized direct notice to all members of the  
21 Class who can be identified through reasonable efforts.

22 11. It is my opinion, based on my experience, as well as the expertise of my team, that this method  
23 of focused notice dissemination provides effective notice in this Action, will provide the best notice that is  
24 practicable, adheres to Cal. R. 3.769(f) and Fed. R. Civ. P. 23, follows the guidance set forth in the Manual  
25 for Complex Litigation 4th Ed. and FJC guidance, and exceeds the requirements of due process, including  
26 its “desire to actually inform” requirement.<sup>3</sup>

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28 <sup>3</sup> *Mullane v. Cent. Hanover Bank & Trust Co.*, 339 U.S. 306, 315 (1950)

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I, Ryan Aldridge, declare under the penalty of perjury that the foregoing is true and correct. Executed on this 22<sup>nd</sup> day of August, 2024, in Baton Rouge, Louisiana.



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Ryan Aldridge