

1 **IN THE SUPERIOR COURT FOR THE STATE OF WASHINGTON**

2025 OCT 06 03:33 PM

2 **IN AND FOR KING COUNTY**

SUPERIOR COURT CLERK

3 LAKISHA LEWIS and CZARINA
4 SLAPE, individually and on behalf of
5 all others similarly situated,

6 Plaintiffs,

7 v.

8 SEATTLE HOUSING AUTHORITY,
9

10 Defendant.

E-FILED

Case No. 24-2-16171-6 SEA
CASE #: 24-2-16171-6 SEA

**DECLARATION OF RYAN
ALDRIDGE REGARDING
NOTICE AND SETTLEMENT
ADMINISTRATION**

11
12 I, Ryan Aldridge, hereby declare and verify as follows:

13 **I. INTRODUCTION**

14 1. ***Personal Information.*** I am a Partner at EAG Gulf Coast LLC (“EAG”). EAG
15 was retained as the Settlement Administrator in this Litigation, and, as the project manager
16 over this Settlement, I am personally familiar with the facts set forth in this Declaration.¹

17 2. ***The Capacity and Basis of this Declaration and Verification.*** I am over the age
18 of 21. Except as otherwise noted, the matters set forth in this Declaration and Verification are
19 based upon my personal knowledge, information received from the Parties in this Litigation,
20 and information provided by my colleagues at EAG and our Partners.

21 3. As the duly appointed Settlement Administrator, I verify compliance with the
22 notice requirements contained in the Settlement Agreement, and the Court’s Preliminary
23 Approval Order.
24

25
26
27 ¹ Unless otherwise indicated, all capitalized terms have the same meaning assigned to them
28 in the Settlement Agreement. (ECF No. 53-3).

II. BACKGROUND

4. ***Preliminary Approval.*** On July 22, 2025, the Court entered its Order preliminarily approving the Settlement Agreement and the appointment of EAG as Settlement Administrator. After the Court's preliminary approval of the Settlement, EAG began to implement and coordinate the notice program.

5. ***The Purpose of this Declaration and Verification.*** I submit this Declaration to evidence EAG's compliance with the terms of the Preliminary Approval Order, to detail EAG's execution of its role as the Settlement Administrator, and to verify compliance with the notice requirements contained in the Settlement Agreement and the Court's Preliminary Approval Order.

III. CLASS NOTICE PROGRAM EXECUTION

6. ***Notice Database.*** EAG maintains a database of 71,129 Settlement Class Members ("Notice List") which was used to effectuate the notice program as outlined within the Settlement Agreement. EAG received the class data on August 7, 2025 in one Excel file with a total of 72,064 records. After deduplicating the data, EAG determined that the Settlement Class Member population consists of 71,129 unique records.

7. ***Email Hygiene.*** Before sending the summary notice by email ("Email Notice"), EAG performed a hygiene and verification process designed to protect the integrity of the email campaign and maximize deliverability on the 16,571 email addresses provided in the Notice List. This process includes identifying and removing invalid email addresses and domains. A total of 15,108 email addresses passed the hygiene and verification process.

8. ***Email Notice.*** Beginning on August 21, 2025, in accordance with the Preliminary Approval Order, EAG commenced sending the Email Notice to the 15,108 Class Members on the Notice List with an email address that passed hygiene and verification. The Email Notice included (a) the web address to the case Settlement Website for access to additional information, and (b) rights and options as a Settlement Class Member to submit a claim or opt out or object to the Settlement and the dates by which to act on those options.

1 EAG followed standard email best practices, including utilizing “unsubscribe” links and
2 providing Settlement Administrator contact information in the Email Notice. Ultimately, the
3 Email Notice was successfully delivered to 14,289 Class Members. A copy of the Email
4 Notice is attached hereto as **Exhibit A**.

5 9. **Mail Notice.** EAG coordinated and caused the Notice in the form of a postcard
6 (“Postcard Notice”) to be mailed via First-Class Mail to Settlement Class Members for whom
7 a valid email address was not available but a mailing address was available from the class
8 data. The Postcard Notice included (a) the web address to the Settlement Website for access
9 to additional information, and (b) rights and options as a Settlement Class Member to submit
10 a claim or opt out or object to the Settlement and the dates by which to act on those options.
11 A true and correct copy of the Postcard Notice is attached hereto as **Exhibit B**.

12 10. **Mailing Address Validation.** Prior to the mailing, all mailing addresses were
13 checked against the National Change of Address (NCOA) database maintained by the United
14 States Postal Service (“USPS”). In addition, the addresses were certified via the Coding
15 Accuracy Support System (CASS) to ensure the quality of the zip code and verified through
16 Delivery Point Validation (DPV) to verify the accuracy of the addresses.

17 11. **Mail Notice Delivery.** In the initial mailing campaign, EAG executed mailings
18 to 52,227 Settlement Class Members that passed address validation and a secondary mailing
19 to 780 Settlement Class Members whose email notice was unsuccessful but for whom we had
20 mail address. EAG also executed supplemental mailings for 8,716 Settlement Class Members
21 for whom the initial Postcard Notice was not deliverable but for whom EAG was able to
22 obtain an alternative mailing address through (1) forwarding addresses provided by the USPS,
23 (2) skip trace searches using a third-party vendor database, or (3) requests received directly
24 from Settlement Class Members. Mail notice delivery statistics are detailed in Section 16
25 below.

26 12. **Settlement Post Office Box.** EAG maintains the following Post Office Box for
27 the Notice Program:
28

1 SHA Settlement Administrator

2 PO Box 1068

3 Baton Rouge, LA 70821

4 This P.O. Box serves as a location for the USPS to return undeliverable program mail
5 to EAG and for Settlement Class Members to submit exclusion requests, Claim Forms, and
6 other settlement-related correspondence. The P.O. Box address appears prominently in all
7 notices, the Claim Form, and in multiple locations on the Settlement Website. EAG monitors
8 the P.O. Box daily and uses a dedicated mail intake team to process each item received.

9 13. **Settlement Website.** On August 20, 2025, EAG published the Settlement
10 Website, available at www.SeattleHADataIncident.com. Visitors to the Settlement Website
11 can download the notice, the Claim Form, and other Court documents, such as the Class
12 Action Amended Complaint, the Settlement Agreement, the Unopposed Motion for
13 Preliminary Approval, Orders of the Court, and other relevant documents. Visitors were also
14 able to submit claims electronically, identify important dates and deadlines, and access
15 contact information for the Settlement Administrator. As of October 6, 2025, the Settlement
16 Website received 12,739 unique visits.

17 14. **Toll-Free Number.** On August 20, 2025, EAG established a dedicated toll-free
18 telephone number, 1-844-405-6502, which is available twenty-four hours per day. Settlement
19 Class Members can call and interact with an interactive voice response (IVR) system that
20 provides important Settlement information and offers the ability to leave a voicemail message
21 to address specific requests or issues. EAG also provided copies of the notice, paper Claim
22 Form, as well as the Settlement Agreement, upon request to Settlement Class Members,
23 through the toll-free number. The toll-free number appeared in all notices, as well as in
24 multiple locations on the Settlement Website. The toll-free number will remain active through
25 the close of this notice program.

26 15. **Email Support.** EAG established an Email address,
27 info@SeattleHADataIncident.com, to provide an additional option for Settlement Class
28

Members to address specific questions and requests to the Settlement Administrator for support.

IV. NOTICE PROGRAM REACH

16. **Notice Reach Results.** Through the Notice procedures outlined above, EAG attempted to send direct notice to 67,335 (94.67%) Settlement Class Members with sufficient email or mailing information to attempt notice. As of October 6, 2025, the Notice Program reached a total of 59,469 (83.61%)² of Settlement Class Members.³ Table 1 below provides an overview of dissemination results for the notice program and reach statistics for the notice program.

Table 1: Direct Notice Program Dissemination & Reach		
Description	Volume of Class Members	Percentage of Class Members (%)
Class Member Database	71,129	100.00%
Postcard Notice:		
(+) Total Notices Mailed	52,227	73.43%
(-) Total Dropped/Returned	15,763	30.18%
Email Notice:		
(+) Total Notices E-Mailed	15,108	21.24%
(-) Total Undeliverable Emails	819	5.42%
Supplemental Notice:		
(+) Total Unique Notices Re-Mailed	8,716	12.25%
(-) Total Undeliverable (Re-Mailed) Notices	0	0.00%
Direct Notice Program Reach		
Received Postcard Notice	45,180	86.51%
Received Email Notice	14,289	94.58%
(=) Received Direct Notice	59,469	83.61%

² The lynchpin in an objective determination of the adequacy of a proposed notice effort is whether all the notice efforts together will reach a high percentage of the class. It is reasonable to reach between 70-95%. Here, the notice effort reached over 83% of the Settlement Class Members. *2010 Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide* (2010).

³ A Settlement Class Member is considered "reached" by direct Notice if a Postcard mailed to the Settlement Class Member has not been returned by the USPS as undeliverable.

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V. CLAIM ACTIVITY

17. ***Claim Intake and Processing.*** The online claim submission feature was available beginning August 20, 2025. As of October 6, 2025, EAG has received a total of 2,104 claims submissions. A claims rate of 2.95%. EAG will continue to intake and analyze claims through the November 19, 2025 Claims Deadline.

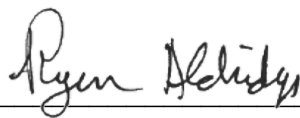
VI. EXCLUSIONS AND OBJECTIONS

18. ***Exclusions (Opt-Outs) Received.*** The deadline to submit a request for exclusion is October 20, 2025. As of October 6, 2025, EAG has received a total of zero (0) exclusion requests from Settlement Class Members.

19. ***Settlement Objections.*** The deadline to object to the Settlement is October 20, 2025. As of October 6, 2025, EAG has received zero (0) objections from Settlement Class Members.

VII. CERTIFICATION

I, Ryan Aldridge, declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 6th day of October, 2025 at Baton Rouge, Louisiana.



Ryan Aldridge

EXHIBIT A

Subject: Notice of Settlement - Lewis et al v Seattle Housing Authority From:
Seattle HA Settlement Administrator <notice@pnclassaction.com>
To: [REDACTED]

Settlement Class Member:
Claim ID: BLK-0000000

If your personal information was accessed and/or acquired in a Data Breach impacting the Seattle Housing Authority (SHA) in October 2023, you may be entitled to a payment from a class action Settlement.

A court authorized this notice. This is not a solicitation from a lawyer.

This notice is only a summary of the key Settlement terms. A full copy of the Settlement Agreement and Long Form Notice is available at www.SeattleHADataIncident.com or by calling 1-844-405-6502.

A proposed settlement has been reached in a class action lawsuit against the Seattle Housing Authority ("SHA" or "Defendant") relating to a data breach that occurred in or around October 2023, during which unauthorized parties may have accessed and/or acquired certain personal information of SHA residents and employees. The case is titled *Lewis et al. v. Seattle Housing Authority*, Case No. 24-2-16171-6 SEA (King Cnty. Super. Ct.). SHA denies all allegations and any wrongdoing. The settlement is not an admission of liability.

Am I included?

Yes. If you received this notice, SHA's records indicate that your personal information may have been accessed and/or acquired in the Data Breach.

What are the benefits?

The Settlement provides for a Settlement Fund of \$486,000 which will include compensation for reimbursement for documented Out-of-Pocket Losses, reimbursement for Lost Time spent responding to the Data Breach, or an Alternative Cash Payment. You must submit a Valid Claim to receive benefits.

- **Out-of-Pocket Losses:** Up to \$5,000 for documented, unreimbursed costs that were incurred as a result of the Data Breach.
- **Lost Time:** Up to 4 hours at \$25/hour (maximum \$100) for attested time spent responding to the Data Breach.
- **Alternative Cash Payment:** A flat payment of up to \$100 for those not claiming losses or time, subject to *pro rata* adjustment.

How do I receive a payment?

Settlement Class Members must submit a Claim Form online at SeattleHADataIncident.com or by mail postmarked by **November 19, 2025** to the Settlement Administrator. If you do not submit a Claim Form, you will not receive any Settlement Benefits.

What are my options?

If you **submit a Claim Form**, you will not be able to sue or continue to sue the Defendant about the claims resolved by this Settlement. If you do not want to be legally bound by the Settlement, you must **exclude yourself**; you will not receive any Settlement Benefits, but you will keep your right to sue the Defendant in a separate lawsuit about the claims resolved by this Settlement. If you do not exclude yourself, you can **object** to the Settlement. Any Settlement Class Member who does not file a timely and adequate objection waives the right to object or to be heard at the Final Approval Hearing, shall be bound by the Settlement Agreement, and shall be forever barred from making any objection to the Settlement. The deadline to exclude yourself or object is **October 20, 2025**. If you **do nothing**, you will remain in the class, you will not be eligible for benefits, and you will be bound by the decision of the Court and give up your rights to sue Defendant for the claims resolved by this Settlement.

Has the Court approved the Settlement?

The Court will hold a Final Approval Hearing on **Friday, December 5, 2025, at 9:00 A.M. PT**, to determine whether the Settlement is fair, reasonable, and adequate, and to consider attorneys' fees (up to \$145,800), costs, and service awards (\$4,000 each) to the Class Representatives. If there are objections, the Court will consider them.

You do not need to attend the hearing to receive benefits.

How do I get more information?

This notice is only a summary. For additional information, please visit SeattleHADataIncident.com or call toll-free **1-844-405-6502**. You may also write to the Settlement Administrator at SHA Data Settlement, P.O. Box 1068, Baton Rouge, LA 70821.

[Unsubscribe](#) - [Unsubscribe Preferences](#)

EXHIBIT B

Legal Notice

**TO BE OPENED BY
THE INTENDED
RECIPIENT ONLY**

*This is not a solicitation
from a lawyer*

The following translations are
available:

Vietnamese	Tiếng Việt
Somali	Soomaali
Amharic	አማርኛ
Tigrinya	ትግርኛ
Spanish	Español
Arabic	عربى

Go to ➡ www.SeattleHADataIncident.com

SHA Data Settlement
P.O. Box 1068
Baton Rouge, LA 70821

PRESORTED
FIRST CLASS
U.S. POSTAGE
PAID
FPI

ELECTRONIC SERVICE REQUESTED

SETTLEMENT CLAIM ID: [claim Id]
[FIRST NAME] [LAST NAME]
[ADDRESS1]
[ADDRESS2]
[CITY] [STATE] [ZIP]



Postal Service: Do Not Mark or Cover Barcode

GC06

Questions? Visit www.SeattleHADataIncident.com or call 1-844-405-6502

Signature: _____
Date (mm/dd/yyyy): _____
By signing my name, I swear and affirm I am completing this Claim Form to the best of my personal knowledge.

*Please provide the email address or phone number associated with your PayPal, Venmo or Zelle account:

Select one of the following payment methods: *PayPal _____ *Venmo _____ *Zelle _____ Check _____
If you are not claiming Out-of-Pocket Losses or Lost Time, you must select a payment method and include your associated email or phone number below.
In order for your claim to be valid, you may be eligible for an Alternative Cash Payment up to \$100, subject to pro rata adjustment. If you are not claiming Out-of-Pocket Losses or Lost Time, you must submit additional information online or by mailing the full claim form available on the Settlement Website, this tear-off form cannot be used.
You may be eligible for reimbursement of up to \$5,000 for documented Out-of-Pocket Losses and up to \$100 for Lost Time (up to 4 hours at \$25/hour) related to the Data Breach. To file a claim for Out-of-Pocket Losses and Lost Time, you must submit additional information online or by mailing the full claim form available on the Settlement Website, this tear-off form cannot be used.
Expense Reimbursement for Documented Out-of-Pocket Losses and Lost Time

Full Name: _____
Address: _____
City, State, Zip Code: _____
Email Address: _____

Claims must be postmarked or submitted online no later than November 19, 2025.
Contact Information (Please fill in completely.)



Claim Form — Claim ID: [claim Id]
Lewis et al. v. Seattle Housing Authority, Case No. 24-2-16171-6 SEA

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Am I included? Yes. If you received this notice, SHA's records indicate that your personal information may have been involved in the Data Breach.

What are the benefits? The Settlement provides for a Settlement Fund of \$486,000 which will include compensation for Expense Reimbursement for out-of-pocket losses, reimbursement for Lost Time spent responding to the breach, or an Alternative Cash Payment. You must submit a Valid Claim to receive benefits.

- **Expense Reimbursement:** Up to \$5,000 for documented, unreimbursed costs that were incurred and arose from the Data Breach.
- **Lost Time:** Up to 4 hours at \$25/hour (maximum \$100) for attested time spent responding to the breach.
- **Alternative Cash Payment:** A flat payment of up to \$100 for those not claiming losses or time, subject to pro rata adjustment.

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www.SeattleHADataIncident.com

1-844-405-6502



Lewis v Seattle Housing Authority Settlement Administrator
P.O. BOX 1068
BATON ROUGE, LA 70821-9896

POSTAGE WILL BE PAID BY ADDRESSEE

BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. 416 BATON ROUGE, LA

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

