#### UNITED STATES DISTRICT COURT

#### SOUTHERN DISTRICT OF NEW YORK

JAMI KANDEL, MOCHA GUNARATNA, and RENEE CAMENFORTE, individually and on behalf of all others similarly situated,

Plaintiffs,

Case No. 1:23-cv-01967-ER

VS.

DR. DENNIS GROSS SKINCARE LLC, a New York Limited Liability Company,

Defendant.

Honorable Edgardo Ramos

DECLARATION OF BRANDON SCHWARTZ REGARDING NOTICE PLAN AND SETTLEMENT ADMINISTRATION

#### I, Brandon Schwartz, declare as follows:

- 1. I am the Director of Legal Notice for EAG Gulf Coast, LLC ("EAG")<sup>1</sup>, a full-service administration firm providing legal administration services, including the design, development, and implementation of unbiased complex legal notification programs.
- 2. In the Declaration of Brandon Schwartz in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement ("Schwartz Decl.," Dkt. 66) filed on June 25, 2024, and submitted along with my C.V., I detailed the proposed Notice Plan to administer the claims process in the above-referenced matter (the "Action"). As stated in the Schwartz Declaration, EAG designed the Notice Plan to give notice to the Settlement Class Members in the most practicable manner possible. To do so, EAG designed, and the Honorable Edgardo Ramos approved, a multifaceted approach utilizing a combination of (1) email notice, (2) mailed notice, (3) digital banner and social media notice, (4) search advertising, (5) press release, (6) Settlement Website, and (7) toll-free hotline.
- 3. On June 28, 2024, Judge Ramos approved the Notice Plan, related notice forms, and appointed EAG as the Settlement Administrator in the *Order Granting Preliminary Approval of Settlement* ("**Preliminary Approval Order**"). Preliminary Approval Order ¶¶ 10-13.
- 4. In the Order, Judge Ramos conditionally certified a Class defined as "[a]ll persons in the United States who, between March 10, 2016 and the date of entry of this Preliminary Approval Order, purchased in the United States, for personal or household consumption and not for resale or distribution, one of the Class Products. Excluded from the Settlement Class are: (1)

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<sup>&</sup>lt;sup>1</sup> As of May 21, 2023, the Directors & employees of Postlethwaite & Netterville (P&N), APAC joined EisnerAmper as EAG Gulf Coast, LLC.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used herein and not otherwise defined have the same meaning ascribed to them as in the Settlement Agreement, Dkt. No. 65-1.

the presiding judges in the Actions; (2) any member of those judges' immediate families; (3) Defendant; (4) any of Defendant's subsidiaries, parents, affiliates, and officers, directors, employees, legal representatives, heirs, successors, or assigns; (5) counsel for the Parties; and (6) any persons who timely opt-out of the Settlement Class." The court also ordered that the Settlement Website go live no later than 21 calendar days from the Order date, and that the Settlement Notice should be issued no later than 30 calendar days from the Order date.

5. Beginning on July 19, 2024, EAG began to implement the Notice Plan in accordance with its requirements. This declaration will discuss the implementation of the Notice Plan and Settlement Administration.

#### **Notice Plan Summary**

#### Class Action Fairness Act Notice ("CAFA")

- 6. On or about July 3, 2024, pursuant to 28 U.S.C. §1715, EAG, on behalf of the Defendant, caused notice of this Settlement and related materials to be sent to the Attorneys General of all U.S. states, U.S. Territories and Puerto Rico as well as the Attorney General of the United States.
- 7. To date, EAG has not received any objection or any other response from any Attorneys General. A copy of the CAFA Notices and mail list are attached hereto as **Exhibit A**.

#### Direct Notice Database

8. The Parties informed EAG that the estimated Class size is 287,001. Of that, EAG maintains a database of 177,769 Settlement Class Members ("DDG Notice List") which was used to effectuate direct notice as outlined within the Settlement Agreement. In June 2023, EAG effectuated notice in the *Gunaratna* class certification matter. As part of that notice program, Class Counsel provided four Excel data files containing contact information for California class

members, sourced from both retail sales records and direct sales from DDG's website. The initial file shared with EAG included direct sales data from DDG and retail sales data from Sephora, LovelySkin, Dermstore, Space NK, and Birchbox. The next two files contained sales records from Bloomingdales, while the final file held sales records from QVC customers. These records resulted in notices being sent to 28,444 email addresses and were reviewed again for inclusion in this notice plan.

9. On or about June 24, 2024, the Defendant through Defendant's Counsel provided sales and contact details for 55,796 Settlement Class Members who purchased directly from the DDG website. On or about June 28, 2024, EAG received an updated data file (original data file sent on June 13, 2024) from Sephora which included sales and contact details for 143,256 Settlement Class Members. EAG de-duplicated the collective data records based on name and address and determined that 177,769 unique Settlement Class Members existed. Further, EAG identified 172,645 Settlement Class Members with contact information sufficient to attempt notice. Of the 172,645 Settlement Class Members, 124,408 had both a valid email and mailing address, 26,720 only had a valid email, and 21,517 only had a valid mailing address (collectively, the "DDG Notice List"). Individual notice was attempted to all on the DDG Notice list. Where both a valid mailing address and a valid email address existed for a Settlement Class Member, they were sent a Postcard Notice and an Email Notice.

#### **Email Notice**

10. Beginning on July 29, 2024, EAG sent the Email Notice to the 151,128 deliverable email addresses on the DDG Notice List. Ultimately, the Email Notice was successfully delivered to 148,169 email addresses, or 98.04% deliverability. A true and correct copy of the Email Notice is attached hereto as **Exhibit B**. Email notice delivery statistics are detailed in Table 1 below.

#### Postcard Notice

- 11. EAG coordinated and caused the Postcard Notice to be mailed via USPS First-Class Mail to Settlement Class Members for which a mailing address was available in the DDG Notice List. Among other essential case information, the Postcard Notice included the Settlement Class Members rights and options, upcoming deadlines, the web address to the Settlement Website for access to additional information, the toll-free hotline to reach the Settlement Administrator with additional questions, and a tear-off claim form with pre-paid postage for Settlement Class Members to submit a Claim for payment. The Notice mailing began on July 29, 2024, in accordance with the Preliminary Approval Order. A true and correct copy of the Postcard Notice is attached hereto as **Exhibit C**, with a copy of the Long-Form Notice, and Claim Form.
- 12. Prior to the mailing, all mailing addresses underwent a validation process. The addresses were checked against the National Change of Address (NCOA) database maintained by the USPS. Additionally, the addresses were certified via the Coding Accuracy Support System (CASS) to ensure the quality of the zip code and verified through Delivery Point Validation (DPV) to verify the accuracy of the addresses.
- 13. Upon completion of the validation process, EAG executed mailings to 145,925 Settlement Class Members. EAG also executed supplemental mailings to 11,193 Settlement Class Members for which the initial Postcard Notice was returned undeliverable, but for which EAG was able to obtain an alternative mailing address through either (1) a forwarded address provided by the USPS, (2) skip trace searches using the LexisNexis third-party vendor database, or (3) requests received directly from Settlement Class Members. Mail notice delivery statistics are further detailed in Table 1 below.

#### Reminder Email Notice

14. As the Claims Deadline approached, EAG identified Settlement Class Members on the DDG Notice List with a deliverable email address who had not yet submitted a Claim Form. In consultation with Class Counsel and Defendant's Counsel, reminder Email Notices were sent to these Settlement Class Members. The reminder Email Notice was successfully delivered to 130,942 email addresses on September 12, 2024. A true and correct copy of the reminder Email Notice is attached hereto as **Exhibit D**.

#### **Direct Notice Reach Results**

15. Through the Notice procedures outlined above, EAG attempted to send direct notice to 177,769 Settlement Class Members on the DDG Notice List. As of October 14, 2024, the direct notice reached a total of 169,294 of Settlement Class Members on the DDG Notice List.<sup>3</sup> On the following page, Table 1 provides an overview of dissemination results for the Notice Program and reach statistics for the direct notice program.

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<sup>&</sup>lt;sup>3</sup> A Settlement Class Member is considered "reached" by direct Notice if either (1) an Email Notice was successfully sent to the Settlement Class Member, or (2) a mailed Notice was not returned by the USPS as undeliverable. If the mailed Notice was returned by the USPS as undeliverable, the Settlement Class Member is considered 'reached' if a subsequent Notice was mailed to an alternative address and was not returned.

Table 1: Direct Notice Program Dissemination & Reach					
Description	DDG Notice List	Percentage of DDG Notice List			
Settlement Class Members	177,769	100.00%			
Email Notice					
(+) Total Email Notices Sent	151,128	85.01%			
(+) Total Email Notices Delivered	148,169	83.35%			
(-) Total Email Notices Bounced/Undelivered	2,959	1.66%			
Notice Mailing					
(+) Postcard Notices Mailed (Initial Campaign)	145,925	82.09%			
(-) Total Postcard Notices Returned as Undeliverable	22,208	12.49%			
Supplemental Notice M	ailing				
(+) Total Unique Postcards Re-mailed	11,193	6.30%			
(-) Total Undeliverable (Re-Mailed) Postcards	1,114	0.63%			
Direct Notice Program	Reach				
(+) Received Only Email Notice	35,498	19.97%			
(+) Received Only Postcard Notice	21,125	11.88%			
(+) Received Both Email and Postcard Notice	112,671	63.38%			
(=) Received Direct Notice	169,294	95.23%			

#### Digital Advertising Notice

16. Pursuant to the Order, EAG caused digital banner notices to run across a network of sites, Facebook, Instagram, X (formerly Twitter), and Reddit. Digital video notices were also displayed on Facebook, Instagram, and TikTok. Digital notices were targeted to individuals in accordance with the Schwartz Decl. (¶26) and allowed website visitors to identify themselves as potential Settlement Class Members and click through to the Settlement Website. More than 137,047,000 impressions were generated during the campaign, which was 811,000 more than described in the Schwartz Decl. Screenshots of the digital banner and video notices are attached as **Exhibit E**.

#### Search Advertising

17. Pursuant to the Order, EAG caused notice to appear by sponsored search advertising via Google Ads and Bing. Sponsored search ads appeared in the search results field on Google.com and Bing.com. Keywords related to the litigation such as: Dr. Dennis Gross; Dr.

Dennis Gross settlement; C+Collagen lawsuit; and Dr. Dennis Gross settlement claim; among others, were used to prompt the sponsored search ads. In total, 48,427 impressions were generated. Screenshots of the sponsored search ads are attached in **Exhibit F**.

#### Press Release

18. Pursuant to the Order, on July 29, 2024, EAG disseminated a nationwide news release over Cision's PR Newswire US1 announcing the Settlement. The release resulted in 454 pickups by media outlets and a total potential audience of 109,900,000. A copy of the release as well as the visibility report is attached as **Exhibit G**.

#### Settlement Website

- 19. On July 19, 2024, EAG took the Settlement Website, www.Cpluscollagenlawsuit.com, live. Visitors to the Settlement Website can download the Class Notices, the Claim Form, court documents such as: the Class Action Complaint (Dkt. No. 1); First Amended Complaint (Dkt. No. 50); and the Settlement Agreement. Visitors can also access motions filed by Class Counsel, including the Memorandum of Law In Support of Plaintiffs' Motion for Award of Attorneys' Fees and Costs and Service Awards (Dkt. No. 73), as well as various Court orders. Visitors were also able to electronically submit Claims, documentation, address updates, find answers to frequently asked questions ("FAQs"), important dates and deadlines, and contact information for the Settlement Administrator.
- 20. As of October 14, 2024, the Settlement Website has received 18,831,609 page views from 6,371,857 unique visitors.

#### **Dedicated Toll-Free Hotline**

21. EAG also established the toll-free hotline, 1-844-931-3243, dedicated to this Settlement. The toll-free hotline is accessible 24 hours per day, seven days per week, and utilizes

an interactive voice response (IVR) system where Settlement Class Members can obtain essential information regarding the Settlement and get responses to FAQs. Settlement Class Members have the option to leave a voicemail and receive a call back from the Settlement Administrator. The toll-free hotline appeared in the Class Notices and in multiple locations on the Settlement Website.

22. As of October 14, 2024, the toll-free hotline has received 338 calls and 105 voicemails, totaling 991 minutes.

#### **Email Support**

23. EAG established the email address, info@Cpluscollagenlawsuit.com, to provide email support, allowing Settlement Class Members to direct specific questions and requests to the Settlement Administrator. The email address is included in the Class Notices and displayed on the Settlement Website.

#### Settlement P.O. Box

- 24. EAG maintains a designated P.O. Box for the administration of the Settlement: DDG C Plus Collagen Settlement Administrator, P.O. Box 3553, Baton Rouge, LA 70821. EAG monitors the Settlement P.O. Box for Settlement-related mail such as Claim Forms, objections, exclusion requests, and inquiries about the Settlement. EAG promptly handles all mail received at the Settlement P.O. Box.
- 25. As of October 14, 2024, EAG has received 6,687 pieces of administrative mail through the P.O. Box.

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#### **Claim Form Submissions and Fraud Analysis**

Case 1:23-cv-01967-ER

#### **Overview**

26. Settlement Class Members had the option of submitting Claims online or mailing the printed Claim Form to the Settlement Administrator. The online Claim Form feature was available on the Settlement Website beginning July 22, 2024. The online Claim Form required Settlement Class Members to provide their preferred method of contact information, information about their purchase history (including documentation, if available), and a certification of the truthfulness of the information contained in the Claim Form. As part of the Claims Process, Settlement Class Members had the option to select their preferred payment method via check or digital payment, such as by Venmo, Zelle, Digital MasterCard<sup>4</sup>, or ACH.

#### Summary of Submitted Claims

- 27. The Claims Deadline was September 27, 2024. As of October 14, 2024, EAG has received 68,245 valid Claim submissions, 2,433 of which contained documentation, accounting for 381,709 total products claimed. The 68,245 valid Claim submissions resulted in a 23.8% claims rate.
- 28. Additionally, at least 34,768 valid Claimants (50.9%) have elected to receive a digital payment. EAG shall continue to analyze Claims that have already been received as well as any additional timely Claims mailed to the P.O. Box and postmarked by the Claims Deadline. Table 2 on the following page provides summary statistics of Claim submissions and current dispositions.

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<sup>&</sup>lt;sup>4</sup> In instances where a Class Member has elected to receive a MasterCard digital payment, EAG does not engage in any form of revenue sharing, such as profiting from inactivity fees or unredeemed balances.

Table 2: Claims Statistics Summary (as of October 14, 2024)				
Description	Volume (#)			
(+) Online Claims	4,216,525			
(+) Hard Copy Claims	6,638			
<b>Total Claims Received</b>	4,223,163			
(-) Duplicate Claims	269,948			
(-) Invalid Claims: High Confidence Fraud	3,573,439			
(-) Invalid Claims: Suspected Fraud	311,424			
(-) Late Claims	107			
Net Claims Received	68,245			

#### Fraud Procedures and Analysis

29. EAG employs a cutting-edge, three-tiered defense strategy that combines industry-leading technologies with human oversight. EAGs first line of defense is an advanced machine learning supported Web Application Firewall ("WAF"). This WAF is continuously updated in real-time based on insights from the global network, ensuring proactive protection against emerging threats. The second tier of our defense utilizes sophisticated AI algorithms to detect and mitigate bot and scripted browser traffic, effectively distinguishing between legitimate and malicious activities to prevent attacks like credential stuffing in real-time. These algorithms compare data across all active case websites allowing us to identify patterns and bad actors across tens of millions of website interactions. Our third and most comprehensive line of defense involves a team of dedicated fraud prevention specialists who employ a proprietary, multi-faceted approach. This includes AI-powered fuzzy matching to identify abnormal patterns indicative of fraud, digital fingerprint verification, and comprehensive monitoring of suspicious IPs and domains across all cases. By leveraging technology, we ensure that our fraud mitigation practices not only meet but exceed industry standards.

- 30. In further strengthening EAG's fraud analysis process in this Action, EAG partnered with ClaimScore<sup>5</sup>, a proprietary claim validation and fraud detection software solution. The coordinated approach to Claims analysis and Claim fraud detection provided a multilayered review of claims through EAG's three-tiered approach and ClaimScore's score-based system. Together, more than 3,884,863 fraudulent claims were identified and deemed invalid.
- 31. The findings from the claims analysis, as presented in Table 2 above, categorize all claims into three distinct tiers: duplicate claims, high-confidence fraudulent claims, and suspected fraudulent claims. These categories are further described below.
- 32. **Duplicate Claims:** Defined as two or more Claims submitted with the same name and address. In instances of Duplicate Claims, EAG counts only the Claim with the highest calculated base refund.
- 33. **High Confidence Fraud Invalid Claims:** Consist of Claims identified by EAG and its partners that exhibit known characteristics of automated Claim submissions and other indicators of abuse. These characteristics include Claims where (1) the same IP address appears more than twenty (20) times, (2) Claims identified by hCaptcha<sup>6</sup> as a verified bot submission, (3) the email address associated with the Claim is either included in a database maintained by EAG or its partners of known fraudulent email addresses or registered with a foreign Email Service Provider and the Claimant has elected to receive a settlement payment as a digital payment card to the known fraudulent email, (4) the IP is registered to a foreign Internet Service Provider,

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<sup>&</sup>lt;sup>5</sup> ClaimScore LLC is a technology company that offers AI-based claim validation software for class action settlements. ClaimScore uses a proprietary scoring system designed to provide a transparent and efficient approach to the claims process. *See* <a href="www.claimscore.ai">www.claimscore.ai</a>.

<sup>&</sup>lt;sup>6</sup> hCaptcha provides the industry's most accurate bot detection through its class-leading adaptive challenge platform and online learning capabilities. Its advanced network of machine learning algorithms ensures that bots are reliably detected and trains in real-time to identify and mitigate the latest threats. *See* www.hcaptcha.com.

and/or (5) Claims rejected by ClaimScore for fraudulent activity. Many of the Claims identified as High Confidence Fraud exhibit multiple characteristics described above. Claims flagged as High Confidence Fraud will be denied and will not receive notice.

- 34. **Suspected Fraud Invalid Claims:** Consists of Claims identified by EAG and its partners with indicators that suggest that the Claim is likely fraudulent. These indicators include (1) the IP address associated with the Claim appears between six (6) and twenty (20) times, (2) the Claim was submitted with a suspicious email address and selected a digital payment card as the preferred payment method, (3) hCaptcha identified the Claim as a possible bot submission, and/or (4) ClaimScore rejected the Claim submission for fraudulent activity.<sup>8</sup>
- 35. EAG will send a notice to each Suspected Fraud Claim informing the Claimant that additional information is required to verify their Claim. The notice will provide instructions for verifying the Claim, and any Claim that is not verified by the deadline provided will be denied. Suspected Fraud Claimants will have 21 days to complete the verification process. EAG will send a reminder email to those Claimants who have not verified their Claim at least seven (7) days prior to the deadline.

#### **Notice and Administration Expenses**

36. As of October 14, 2024, EAG has incurred \$400,855.23 in fees and costs completing the Notice Plan and administering the Settlement and anticipates incurring \$81,770.49 in additional fees and costs for administration for a total cost of \$482,625.72 for the Notice Plan and Settlement Administration.

<sup>&</sup>lt;sup>7</sup> Bryan Heller, Declaration of Bryan Heller Regarding Claim Validation and Fraud Detection Using ClaimScore (¶30-36).

<sup>&</sup>lt;sup>8</sup> *Id*.

#### **Settlement Fund Summary**

37. If the Court awards the requested attorneys' fees, costs, incentive awards, and administrative costs (as outlined in Paragraph 26 above), the Settlement Class recovery amount will be \$5,157,075.23 as shown in Table 3 below.

Table 3: Settlement Fund Summary (as of October 14, 2024)				
<b>Total Settlement Fund</b>	\$9,200,000.00			
(+) Bank Interest (as of Sept. 30, 2024)	\$84,230.74			
(-) Attorney's Fees & Expenses	\$3,524,116.66			
(-) Service Awards	\$15,000.00			
(-) EAG Admin Fees	\$482,625.72			
(-) ClaimScore Fees	\$105,413.13			
Net Settlement Fund	\$5,157,075.23			
Net Units Available for Pro Rata	135,509			
Pro Rata Value of Each Unit	\$38.05			

38. The Settlement Agreement estimated valid Claims would be awarded an allocation of \$50.00 for each Class Product. The total value of approved Claims is expected to exceed the funds available for distribution to Settlement Class Members; therefore, cash awards are expected to be decreased pro rata. After pro rata adjustment, EAG estimates an allocation of \$38.05 for each Class Product. As of October 14, 2024, EAG anticipates an overall average payment of \$75.57.9

#### **Objections and Exclusions**

- 39. EAG has not received any exclusion request from a Settlement Class Member as of October 14, 2024. The deadline to submit a Request for Exclusion was September 27, 2024.
- 40. The Order directs Settlement Class Members to mail objections to the Settlement Administrator at the addresses set forth in the Class Notice. EAG does not have any knowledge

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<sup>&</sup>lt;sup>9</sup> The average payment for non-documented claims is \$73.63 and the average payment for documented claims is \$127.44.

of any objections filed to date. EAG did not receive any objections from Settlement Class Members.

#### **Conclusion**

- 41. In class action notice planning, execution, and analysis, we are guided by due process considerations under the United States Constitution and by case law pertaining to the recognized notice standards under Federal Rules of Civil Procedure, Rule 23 ("FRCP 23"). This framework directs that a notice plan be optimized to reach the class and, in a settlement notice situation such as this, that the notice or notice plan itself not omit any material information regarding legal rights—or the ability to exercise other options—to class members in any way. All of these requirements were met in this case, and in my opinion, the above-described Notice Plan was consistent with other effective class action notice programs.
- 42. In total, the Notice Plan delivered a reach of more than 85% with an average frequency of 2.58. The measurable reach of the Notice Plan does not include search advertising, the Settlement Website, toll-free hotline, & press release, as these media vehicles are difficult to calculate. They, however, meaningfully strengthened the reach and frequency of the Notice Plan.
- 43. It is my opinion, based on my expertise and experience and that of my team, that the methods of notice dissemination implemented by this Settlement, and Judge Ramos' Preliminary Approval Order, provided effective notice of the Settlement, provided the best notice that is practicable, adhered to FRCP 23, followed the guidance set forth in the Manual for Complex Litigation 4th Ed. and Federal Judicial Center (FJC) guidance, and met the requirements of due process, including its "desire to actually inform" requirement.
- 44. The Notice Plan schedule afforded enough time to provide full and proper notice to Settlement Class Members before the Opt-Out and Objection Deadlines.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 17th day of October 2024 in Portland, Oregon.

Brandon Schwartz



**EAG Gulf Coast, LLC** 

Exhibit A: CAFA Notice

8550 United Plaza Blvd., Ste. 1001 – Baton Rouge, LA 70809 225-922-4600 Office – 225-922-4611 Fax





July 1, 2024

#### By Certified Mail

Federal and State Officials as listed in Attachment 1

Re: NOTICE UNDER THE CLASS ACTION FAIRNESS ACT OF 2005, 28 U.S.C. § 1715(b),

Kandel v. Dr. Dennis Gross Skincare, LLC, No.: 1:23-cv-01967-ER

#### Dear Sir or Madam:

I send this letter and the enclosed disc to you on behalf of the Parties to the action referenced above (the "Parties") regarding the Motion for Preliminary Approval of Class Settlement filed on June 25, 2024. This communication constitutes the notice required by the Class Action Fairness Act of 2005, 28 U.S.C. § 1715(b) ("CAFA").

The proposed Settlement resolves class action lawsuits brought by Mocha Gunaratna, Renee Camenforte, and Jami Kandel ("Plaintiffs") against Dr. Dennis Gross Skincare, LLC ("Defendant") alleging that Defendant deceptively and unlawfully labeled, packaged, and marketed its "C+Collagen" line of products because the products do not contain collagen. Defendant denies all of the allegations and claims in these lawsuits and denies that it did anything unlawful or improper. The specific products included in the Settlement (the "Class Products") are identified in the Settlement Agreement.

In accordance with 28 U.S.C. § 1715(b), the enclosed disc includes:

- a. Exhibit 1: A copy of the Class Action Complaint filed in *Kandel, et al. v. Dr. Dennis Gross Skincare, LLC,* Case No. 1:23-cv-01967-ER (S.D.N.Y.) ("the Kandel action") on March 7, 2023;
- b. Exhibit 2: A copy of the First Amended Complaint filed in the Kandel action on March 26, 2024;
- c. Exhibit 3: A copy of Plaintiffs' Notice of Unopposed Motion and Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of a Class Action Settlement filed in the *Kandel* action on June 25, 2024;
- d. Exhibit 4: A copy of the Settlement Agreement and Release with exhibits including the Long Form Notice, Short-Form Notice, Postcard Notice and Notice Plan (with exclusion rights) and proposed orders filed on June 25, 2024;
- e. Exhibit 5: A copy of the Order Granting Preliminary Approval of Settlement issued in the *Kandel* action on June 28, 2024.

The Final Approval Hearing is scheduled for October 31, 2024, at 10:30 a.m., in the courtroom of the Honorable Edgardo Ramos, Courtroom 619, at the United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007. 28 U.S.C. §§ 1715(b)(7)(A)-(B), CAFA, requires that a defendant, "if feasible," must provide "the names of class members who reside in each State and the estimated proportionate share of the claims of such members to the entire settlement," or "if not feasible, a reasonable estimate of

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<sup>&</sup>lt;sup>1</sup> In addition to *Kandel*, if approved, the settlement will resolve essentially identical claims brought in *Gunaratna*, et. al. v. Dr. Dennis *Gross Skincare*, LLC, Case No. 2:20-cv-0231 (C.D. Cal.).

Baton Rouge, LA 70809

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pnclassaction.com

the number of class members residing in each State and the estimated proportionate share of the claims of such members to the entire settlement."

In this matter, it is not feasible to identify all Class Members nor provide an estimate of the number of Class Members who reside in each state because Defendant sells through distributors and not exclusively directly to consumers via its website. However, Defendant anticipates that the Settlement Class is sufficiently numerous as to include Class Members potentially residing in all 50 U.S. states, as well as the District of Columbia, and may include Class Members who are military personnel stationed overseas.

There are no other agreements between the Parties, there are no final judgments in this matter, and there are no other written judicial opinions relating to the settlement or the other issues described under 28 U.S.C. §§ 1715(b)(3)-(6) and (8).

Thank you for your attention to this matter. If you have any questions about this notice or the enclosed materials, please contact us.

Sincerely,

Jordan Turner

Postlethwaite & Netterville<sup>2</sup>, Settlement Administrator

**Enclosures** 

cc by email:

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<sup>&</sup>lt;sup>2</sup> As of May 21, 2023, the Directors & employees of Postlethwaite & Netterville (P&N), APAC joined EisnerAmper as EAG Gulf Coast, LLC. Where P&N is named as an entity, EAG Gulf Coast, LLC employees will service work contracted with P&N.



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Counsel for Defendant Dr. Dennis Gross Skincare

	Kandal V. Di	CAFA Notice Service					
Name1	Name2	r. Dennis Gross Skincare, LLC, No. 1:23-c Address1	Address2	Address3	City	State	Zip
Office of the Attorney General	Namez	1031 W. 4th Avenue, Suite 200	Audiessz	Addresss	Anchorage	AK	99501-1994
Office of the Attorney General		501 Washington Avenue	PO Box 300152		Montgomery	AL	36104
Office of the Attorney General		323 Center Street, Suite 200	1 0 DOX 300132		Little Rock	AR	72201-2610
·		PO Box 7					
Office of the Attorney General					Pago Pago	AS	96799
Office of the Attorney General	CAEA Considerator Companyor Love Continu	2005 N Central Ave	<u> </u>		Phoenix	AZ	85004-2926
Office of the Attorney General	CAFA Coordinator, Consumer Law Section	455 Golden Gate Avenue, Suite 11000	1200 Breadway 10th Flags		San Francisco	CA	94102
Office of the Attorney General		Ralph L. Carr Colorado Judicial Center	1300 Broadway, 10th Floor		Denver	CO	80203
Office of the Attorney General		165 Capitol Avenue	<u> </u>		Hartford	СТ	06106
Office of the Attorney General	UC Demontrace at a filtration	441 4th Street NW, Suite 1100S			Washington	DC	20001
United States Office of the Attorney General	·	950 Pennsylvania Ave, NW	Cth Floor		Washington	DC	20530-0001 19801
Office of the Attorney General		820 North French Street	6th Floor		Wilmington	DE	32399-1050
Office of the Attorney General		The Capital Swans SW	PL-01		Tallahassee	FL	
Office of the Attorney General	Administrative Division	40 Capitol Square SW	<u> </u>		Atlanta	GA	30334
Office of the Attorney General	Administrative Division	590 S. Marine Corps Dr., Suite 901			Tamuning	GU	96913
Department of the Attorney General		425 Queen Street	1205 Foot Woland Street		Honolulu	HI	96813
Office of the Attorney General		Hoover State Office Building	1305 East Walnut Street		Des Moines	IA	50319
Office of the Attorney General		954 West Jefferson Street, 2nd floor	PO Box 83720		Boise	ID	83720-0010
Office of the Attorney General		100 West Randolph Street	202 14/		Chicago	IL	60601
Office of the Attorney General		Indiana Government Center South	302 West Washington Street, 5th Floor		Indianapolis	IN	46204
Office of the Attorney General		120 SW 10th Ave, 2nd Floor			Topeka	KS	66612-1597
Office of the Attorney General		700 Capitol Avenue, Suite 118			Frankfort	KY	40601-3449
Office of the Attorney General		PO Box 94005			Baton Rouge	LA	70804
Office of the Attorney General	ATTN: CAFA Coordinator/General Counsel's Office	One Ashburton Place			Boston	MA	02108
Office of the Attorney General		200 St. Paul Place			Baltimore	MD	21202
Office of the Attorney General		6 State House Station			Augusta	ME	04333
Office of the Attorney General		G. Mennen Williams Building	525 West Ottawa Street	PO Box 30212	Lansing	MI	48909
Office of the Attorney General		445 Minnesota Street, Suite 1400			St Paul	MN	55101-2131
Office of the Attorney General		Supreme Court Building	207 West High Street		Jefferson City	МО	65102
Office of the Attorney General		Administrative Building	PO Box 10007		Saipan	MP	96950
Office of the Attorney General		Walter Sillers Building	550 High Street, Suite 11		Jackson	MS	39201
Office of the Attorney General		Justice Building Third Floor	215 North Sanders		Helena	MT	59601
Office of the Attorney General	ATTN: Consumer Protection	114 West Edenton Street			Raleigh	NC	27603
Office of the Attorney General		State Capitol	600 East Boulevard Avenue, Dept. 125		Bismarck	ND	58505
Office of the Attorney General		2115 State Capitol	PO Box 98920		Lincoln	NE	68509
Office of the Attorney General		33 Capitol Street			Concord	NH	03301
Office of the Attorney General		RJ Hughes Justice Complex	25 Market Street	PO BOX 080	Trenton	NJ	08625-0080
Office of the Attorney General	ATTN: Farrah Diaz, Paralegal	201 3rd St NW, Suite 300			Albuquerque	NM	87102
Office of the Attorney General		Old Supreme Court Building	100 North Carson Street		Carson City	NV	89701
Office of the Attorney General		The Capitol			Albany	NY	12224-0341
Office of the Attorney General		State Office Tower	30 East Broad Street, 14th Floor		Columbus	ОН	43215
Office of the Attorney General		313 NE 21st Street			Oklahoma City	ОК	73105
Office of the Attorney General	Oregon Department of Justice	1162 Court Street NE			Salem	OR	97301-4096
Office of the Attorney General		16th Floor, Strawberry Square			Harrisburg	PA	17120
Office of the Attorney General		PO Box 9020192			San Juan	PR	00902-0192
Office of the Attorney General	ATTN: Lisa Pinsonneault/CAFA Notice	150 South Main Street			Providence	RI	02903
Office of the Attorney General		PO Box 11549			Columbia	SC	29211-1549
Office of the Attorney General		1302 E. Highway 14, Suite 1			Pierre	SD	57501-8501
Office of the Attorney General and Reporter		PO Box 20207			Nashville	TN	37202
Office of the Attorney General		Capitol Station	PO Box 12548		Austin	TX	78711-2548
Office of the Attorney General		Utah State Capitol Complex	350 North State Street, Suite 230		Salt Lake City	UT	84114-2320
Office of the Attorney General		202 North Ninth Street			Richmond	VA	23219
Office of the Attorney General		34-38 Kronprindsens Gade	Gers Building, 2nd Floor		St Thomas	VI	00802
Office of the Attorney General		109 State Street			Montpelier	VT	05609
Office of the Attorney General		1125 Washington Street SE	PO Box 40100		Olympia	WA	98504-0100
Office of the Attorney General	Wisconsin Department of Justice	PO Box 7857			Madison	WI	53707-7857
Office of the Attorney General		State Capitol	Building 1, Room E-26		Charleston	WV	25305
Office of the Attorney General		Kendrick Building	2320 Capital Avenue		Cheyenne	WY	82002



**EAG Gulf Coast, LLC** 

Exhibit B: Email Notice

Subject: Notice of Settlement: Kandel, et al. v. Dr. Dennis Gross Skincare, LLC From: DDG C Plus Collagen Settlement Administrator notice@pnclassaction.com

Reply-To: info@cpluscollagenlawsuit.com

To: Test@email.com

### LEGAL NOTICE BY ORDER OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

Kandel, et al. v. Dr. Dennis Gross Skincare, LLC, No. 1:23-cv-01967-ER U.S. District Court for the Southern District of New York

If you bought any of Dr. Dennis Gross Skincare, LLC's "C+Collagen" Products Between March 10, 2016, and June 28, 2024, you may be entitled to payment.

Click <u>here</u> to file a claim by September 27, 2024.

#### What Is This Notice About?

This Notice is to inform you of the settlement of the class action lawsuit referenced above (the "Action") with Dr. Dennis Gross Skincare LLC ("Defendant" or "DDG"). Plaintiffs in this lawsuit claim that Defendant deceptively labeled its "C+Collagen" products as containing "Collagen," when in fact, they did not contain any collagen. Defendant denies all claims in the lawsuit and denies that it did anything unlawful or improper. The Court did not rule in favor of either side. Rather, the parties have agreed to settle the lawsuit to avoid the uncertainties and expenses associated with ongoing litigation.

#### Am I A Member of The Class?

You are a Settlement Class member if purchased any of Defendant's "C+Collagen" products in the United States, for personal or household use and not for resale or distribution, including DDG's C+Collagen Deep Cream, C+Collagen Serum, C+Collagen Mist, C+Collagen Eye Cream and C+Collagen Mask, and any other products sold with the C+Collagen label, whether sold alone or in combination with other products ("Class Products"), between March 10, 2016, and June 28, 2024, (the "Class Period").

#### What Does the Settlement Provide?

With Court approval, the Settlement provides a Cash Award to Settlement Class Members that submit a valid and timely <u>Claim Form</u>. Settlement Class Members who previously purchased any of the Class Products during the Class Period may submit a claim to

receive Fifty Dollars (\$50) per Class Product purchase, capped at two (2) or ten (10) Class Products, depending on whether they submit proof of purchase.

If the amount in the Net Settlement Fund (net of costs of notice and settlement administration, Settlement Class Counsel's attorneys' fees and litigation expenses and the service awards for Plaintiffs), is either less or more than the amount of the total cash claims submitted by Claimants, the claims of each Claimant will be decreased or increased, respectively, *pro rata*, to ensure the Settlement Fund is exhausted, with no reversion from the Settlement Fund to Defendant. *Pro rata* upward adjustment of cash claims shall be capped at one hundred dollars (\$100) per Class Product. Any amounts remaining in the Net Settlement Fund after checks are issued and cashed or expired shall be disbursed *cy pres*. Those Settlement Class Members whose payments are not cleared within one hundred and eighty (180) calendar days after issuance will be ineligible to receive a cash settlement benefit and the Settlement Administrator will have no further obligation to make any payment from the Settlement Fund pursuant to this Settlement Agreement or otherwise to such Settlement Class Member.

#### What Are My Rights and Options? You have three options:

You Can Make a Claim. Settlement Class Members who wish to receive a Cash Award must submit a Claim Form by visiting the Settlement Website, <a href="https://www.Cpluscollagenlawsuit.com">www.Cpluscollagenlawsuit.com</a>, and submitting a Claim Form (which can also be printed and mailed). The deadline to postmark or submit your claim online is September 27, 2024.

You Can Object to the Settlement. You may also object to any part of this Settlement. Objections must be mailed to the Settlement Administrator and postmarked no later than September 27, 2024.

<u>You Can "Opt-Out" of the Settlement.</u> You can exclude yourself ("opt-out") of the Settlement by submitting an exclusion request to the Settlement Administrator that is **postmarked no later than September 27, 2024**. This is the only option that allows you to be part of any other lawsuit against Defendant about the legal claims in this case.

Details about how to opt-out, object, and submit your Claim Form are available on the <u>Settlement Website</u>.

The Fairness Hearing

On October 31, 2024 at 10:30 am, the Court will hold a hearing at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, Courtroom 619, to approve: (1) the Settlement as fair, reasonable, and adequate; and (2) the application for Plaintiffs' attorneys' fees and litigation costs of up to \$3,900,000, and payment of up to \$15,000 in total to the three Settlement Class Representatives. Settlement Class Members who support the proposed settlement do not need to appear at the hearing or take any other action to indicate their approval.

#### **How Can I Get More Information?**

This is only a summary of the settlement. If you have questions or want to view the detailed notice or other documents about the Litigation, including the Settlement Agreement visit <a href="www.Cpluscollagenlawsuit.com">www.Cpluscollagenlawsuit.com</a>, contact the Settlement Administrator by calling <a href="mailto:1-844-931-3243">1-844-931-3243</a>, by emailing <a href="mailto:info@cpluscollagenlawsuit.com">info@cpluscollagenlawsuit.com</a>, or by writing to DDG C Plus Collagen Settlement Administrator, P.O. Box 3553, Baton Rouge, LA 70821, or contact Class Counsel at DDG@Clarksonlawfirm.com.

DDG C Plus Collagen Settlement Administrator P.O. Box 3553 Baton Rouge, LA 70821 Unsubscribe - Unsubscribe Preferences



**EAG Gulf Coast, LLC** 

Exhibit C: Postcard Notice, Long-Form Notice, Claim Form



United States District Court Kandel, et al. v. Dr. Dennis Gross Skincare, LLC Case No. 1:23-cv-01967-ER

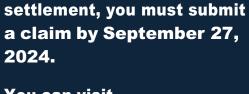
### **Class Action Notice** Authorized by the U.S. District Court



Did you buy any of Dr. Dennis Gross Skincare, LLC's "C+Collagen" **Products for personal or** household use in the United **States between March 10, 2016,** and June 28, 2024?



You may be entitled to payment.



to learn more.

You can visit www.Cpluscollagenlawsuit.com

To get a payment under this

#### **Key things to know:**

- This is an important legal document.
- The parties agreed to this settlement. The Court did not rule for either side and Defendant denies all claims or wrongdoing.
- If you do not act before September 27, 2024, any ruling from the Court will apply to you, and you will not get a payment or be able to sue about the same issues.
- If you have guestions or need assistance, please call 1-844-931-3243.
- You can learn more, including about how to make a claim, object to the settlement or exclude yourself from the settlement, and about the Court's Final Approval Hearing, at www.Cpluscollagenlawsuit.com or by scanning the QR code.

#### **DDG C Plus Collagen Settlement Administrator**

P.O. Box 3553 Baton Rouge, LA 70821 PRESORTED FIRST CLASS U.S. POSTAGE PAID FPI

# Court-Approved Legal Notice



This is an important notice about a class action lawsuit.

**ELECTRONIC SERVICE REQUESTED** 

իսրայիկիկովիրինիրիկոսյինայինիրդիկանինանին

Class Member ID: ABC-1234567 First Name Last Name Address City State Zip





NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

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

POSTAGE WILL BE PAID BY ADDRESSEE

DDG C Plus Collagen Settlement Administrator P.O. BOX 3553 BATON ROUGE, LA 70821-9981

լել||լլեել-գլլիել-գլիեն||-նիրեւ-գլլուլել||լեել-նիիեն-երե

#### **CLAIM FORM**

Claims must be postmarked or submitted by September 27, 2024

Class Member ID: ABC-1234567 First Name Last Name Address City State Zip

If different than the preprinted data on the left, please print your correct information:					
First Name	MI Last Name				
Address					
City	State Zip Code				

Class Products you purchased in the U.S. between March 10, 2016, and June 28, 2024, in the chart below:

Product Purchased	Check all that apply	Total # Purchased	Approx. Date of Purchase
C+Collagen Serum			
C+Collagen Eye Cream			
C+Collagen Deep Cream			
C+Collagen Mask			

Pl	ease	choose	one	of th	ne fo	llowi	ng:

] Check here if you are mailing Proof of Purchase	documentation	with this	s claim form.	If so, please	mail a copy of your
receipt(s) memorializing the purchase of the Class	Products along v	with this	Claim Form to	DDG C Plus	Collagen Settlement
Administrator, P.O. Box 3553, Baton Rouge, LA 70	0821.				

☐ Check here if you are making a claim without a Proof of Purchase (limit of two claims without proof of purchase).

By signing this Claim Form, I affirm under penalty of perjury under the laws of the United States of America that the information on this Claim Form is true and correct to the best of my knowledge.

Signature		Date (MM/DD/YY)	
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#### UNITED STATES DISTRICT COURT - SOUTHERN DISTRICT OF NEW YORK

## If you bought any of Dr. Dennis Gross Skincare, LLC's "C+Collagen" Products between March 10, 2016, and June 28, 2024, then you may be entitled to payment.

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



A settlement has been reached between Dr. Dennis Gross Skincare, LLC ("Defendant" or "DDG") and Jami Kandel, Mocha Gunaratna, and Renee Camenforte ("Settlement Class Representatives" or "Plaintiffs"), individually and on behalf of the Settlement Class. The Settlement resolves class action lawsuits alleging that: (1) Dr. Dennis Gross Skincare owned, manufactured, and distributed products labeled as "C+Collagen" and purporting to contain collagen, when in reality, the products did not contain any collagen; (2) Settlement Class members lost money in the form of the price premium they paid for products as a result of the label. Defendant denies the allegations, contends that the products contained Vitamin C, which promotes production of collagen in human skin, and further denies that it did anything unlawful or improper. The Court did not rule in favor of either side. The parties agreed to the Settlement to avoid the expense and risks of the lawsuit.

- You are a Settlement Class member if you purchased any C+Collagen Product in the United States, for personal or household use and not for resale or distribution, whether sold alone or in combination with other products ("Class Products"), between March 10, 2016, and June 28, 2024 (the "Class Period").
- Settlement Class Members who purchased any of the Class Products during the Class Period may submit a claim to receive Fifty Dollars (\$50) per Class Product purchased, capped at two (2) or ten (10) Class Products, depending on whether they submit proof of purchase.

- □ Settlement Class Members who purchased a Class Product during the Class Period and provide a receipt will receive a cash refund of Fifty Dollars (\$50) per Class Product purchased, with a cap of ten (10) Class Products.
- Settlement Class Members who purchased a Class Product during the Class Period and do not provide a receipt, but complete the Claim Form under penalty of perjury, will receive a cash refund of Fifty Dollars (\$50) per Class Product purchased with a cap of two (2) Class Products.
- □ Each Settlement Class Member may submit a claim either electronically through a settlement website or by mail.
- If the amount in the Net Settlement Fund (net of costs of notice and settlement administration, Settlement Class Counsel's attorneys' fees and litigation expenses and the service awards for Plaintiffs), is either less or more than the amount of the total cash claims submitted by Claimants, the claims of each Claimant will be decreased or increased, respectively, pro rata, to ensure the Settlement Fund is exhausted, with no reversion from the Settlement Fund to Defendant. Pro rata upward adjustment of cash claims shall be capped at one hundred dollars (\$100) per Class Product. Any amounts remaining in the Net Settlement Fund after checks are issued and cashed or expired shall be disbursed cy pres.

Please read this Notice carefully and in its entirety. Your rights may be affected by the Settlement of this lawsuit, and you have a choice to make now about how to act:

Settlement of this lawsuit, and you have a choice						
Your Legal Rights and O	YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT:					
SUBMIT A VALID CLAIM BY September 27, 2024	The only way to get a cash payment, is if you submit a valid claim and qualify.					
EXCLUDE YOURSELF FROM THE CLASS BY September 27, 2024	You will not get any benefits under this Settlement. This is the only option that allows you to be part of any other lawsuit against Defendant about the legal claims in this case.					
OBJECT TO THE SETTLEMENT BY September 27, 2024	Tell the Court about why you don't like the Settlement.					
GO TO A HEARING ON October 31, 2024	Ask to speak in Court about the Settlement.					
DO NOTHING	Get no benefits. Give up rights to be part of any other lawsuit against Defendant about the legal claims in this case.					

- □ These rights and options—and the deadlines to exercise them—are explained in this notice.
- □ The Court in charge of this case still has to decide whether to approve the Settlement. Cash payments for valid claims will be issued only if the Court approves the Settlement and after the time for appeals has ended and any appeals are resolved. Please be patient.

#### WHAT THIS NOTICE CONTAINS

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#### **BASIC INFORMATION**

#### 1. Why was this notice issued?

A Court authorized this notice because you have a right to know about the proposed Settlement in this class action lawsuit, and about all of your options, before the Court decides whether to give "final approval" to the Settlement. This notice explains the lawsuit, the Settlement, and your legal rights.

The case is known as *Kandel, et al., v. Dr. Dennis Gross Skincare, LLC*, Case No. 1:23-cv-01967-ER, currently pending in the U.S. District Court for the Southern District of New York. The Plaintiffs (Jami Kandel, Mocha Gunaratna, and Renee Camenforte) are suing the company Dr. Dennis Gross Skincare, LLC, the Defendant.

#### 2. What is the lawsuit about?

On March 10, 2020, a class action lawsuit was filed against Defendant Dr. Dennis Gross Skincare, LLC, entitled *Gunaratna*, et al v. Dr. Dennis Gross Skincare, LLC, in United States District Court for the Central District of California, Case No. 2:20-cv-02311-MWF-GJS, alleging that: (1) Defendant owned, manufactured, and distributed products labeled as "C+Collagen" and purporting to contain collagen, when in reality, the products did not contain any collagen; and (2) Class Members lost money in the form of the price premium they paid for the "C+Collagen" products—that is, had they known that the products did not contain collagen, they would not have purchased the products, let alone paid a "premium" for them. Plaintiffs seek injunctive relief, restitutionary, actual, statutory, compensatory, and punitive damages, as well as reasonable attorneys' fees and costs.

On March 7, 2024, a similar class action lawsuit was filed against Defendant Dr. Dennis Gross Skincare, LLC, entitled *Kandel, et al v. Dr. Dennis Gross Skincare, LLC*, in United States District Court for the Southern District of New York, Case No. 1:23-cv-01967-ER, alleging the same claims against Defendant as the California action. On March 26, 2024, the New York action was amended to include the California class and California class representatives. (Collectively, these two lawsuits are referred to as "Actions").

Defendant contends that the products contained Vitamin C, which promotes production of collagen in human skin, among other arguments. Defendant denies that it charged a premium and asserts that consumers suffered no harm because they received what they paid for. Defendant denies all the allegations and claims in these cases and denies that it did anything unlawful or improper.

#### 3. Why is this a class action?

In a class action one or more people called "class representatives" (in this case, the named Plaintiffs are Jami Kandel, Mocha Gunaratna, and Renee Camenforte) sue on behalf of people who have similar claims. All of these people or entities are a "class" or "class members." One court resolves the issues for all class members, except for those who exclude themselves from the class.

#### 4. Why is there a settlement?

Both sides agreed to the settlement to avoid the cost and risk of further litigation and trial. The settlement does *not* mean that any law was broken. Defendant denies all of the legal claims in this case. The Class Representatives and the lawyers representing them think the settlement is best for all Settlement Class members.

#### WHO IS IN THE SETTLEMENT?

To see if you are affected or if you can get benefits, you first have to determine whether you are a Settlement Class Member.

#### 5. How do I know if I am part of the Settlement?

You are a member of the Settlement Class if you purchased DDG's C+Collagen Deep Cream, C+Collagen Serum, C+Collagen Mist, C+Collagen Eye Cream or C+Collagen Mask, or any other products sold with the C+Collagen label, whether sold alone or in combination with other products, in the United States, for personal or household use and not for resale or distribution, between March 10, 2016, and June 28, 2024. This time period is referred to as the "Class Period." Excluded from the Settlement Class are the presiding judges in the Actions, any member of those judges' immediate families, Defendant, any of Defendant's subsidiaries, parents, affiliates, and officers, directors, employees, legal representatives, heirs, successors, or assigns, counsel for the Parties, and any persons who timely opt-out of the Settlement Class.

#### 6. I'm still not sure if I'm included in the Settlement.

If you are not sure whether you are included in the Settlement Class, call 1-844-931-3243 or go to www.Cpluscollagenlawsuit.com.

#### THE SETTLEMENT BENEFITS—WHAT YOU GET

#### 7. What does the Settlement provide?

Dr. Dennis Gross Skincare, LLC, has agreed to make available a Total Settlement Fund of Nine Million Two Hundred Thousand Dollars (\$9,200,000) ("Total Settlement Fund"). Settlement Class Members who submit a valid Claim may receive a benefit from the Settlement Fund.

Settlement Class Members who previously purchased any of the Class Products during the Class Period may submit a claim to receive Fifty Dollars (\$50) per Class Product purchased capped at two (2) or ten (10) Class Products, depending on whether they submit proof of purchase.

Settlement Class Members who purchased a Class Product during the Class Period and provide a receipt will receive a cash refund of Fifty Dollars (\$50) per Class Product purchased, with a cap of ten (10) Class Products.

Settlement Class Members who purchased a Class Product during the Class Period and do not provide a receipt, but complete the Claim Form under penalty of perjury, will receive a cash refund of Fifty Dollars (\$50) per Class Product purchased with a cap of two (2) Class Products.

Each Settlement Class Member may submit a claim either electronically through the Settlement Website (www.Cpluscollagenlawsuit.com) or by mail.

If the amount in the Net Settlement Fund (net of costs of notice and settlement administration, Settlement Class Counsel's attorneys' fees and litigation expenses and the service awards for Plaintiffs), is either less or more than the amount of the total cash claims submitted by Claimants, the claims of each Claimant will be decreased or increased, respectively, *pro rata*, to ensure the Settlement Fund is exhausted, with no reversion from the Settlement Fund to Defendant. *Pro rata* upward adjustment of cash claims shall be capped at one hundred dollars (\$100) per Class Product. Any amounts remaining in the Net Settlement Fund after checks are issued and cashed or expired shall be disbursed *cy pres*.

Those Settlement Class Members whose payments are not cleared within one hundred and eighty (180) calendar days after issuance will be ineligible to receive a cash settlement benefit and the Settlement Administrator will have no further obligation to make any payment from the Settlement Fund pursuant to this Settlement Agreement or otherwise to such Settlement Class Member. Any funds that remain unclaimed or are unused after the distribution of the Settlement Fund will be distributed to an appropriate *cy press* charity or charities approved by the Court. Instructions for submitting a Claim are included in Section 9 below.

Any award of attorneys' fees and litigation costs to Class Counsel (not to exceed \$3,900,000) upon Court approval, service awards (up to \$5000 each for the three Settlement Class Representatives), and costs to administer the Settlement will be paid from the Settlement Fund. More details are in a document called the Settlement Agreement, which is available at www.Cpluscollagenlawsuit.com.

# 8. What am I giving up in exchange for the Settlement benefits?

If the Settlement becomes final, Settlement Class Members will be releasing Defendant and all related people and entities for all the claims described and identified in Section 8 of the Settlement Agreement ("Release"). The Release is included below:

The Releasing Parties (as defined in the Settlement Agreement) hereby fully release and forever discharge the Released Parties (as defined in the Settlement Agreement) from any and all actual, potential, filed, known or unknown, fixed or contingent, claimed or unclaimed, suspected or unsuspected, asserted or unasserted, claims, demands, liabilities, rights, debts, obligations, liens, contracts, agreements, judgments, actions, suits, causes of action, contracts or agreements, extra-contractual claims, damages of any kind, punitive, exemplary or multiplied damages, expenses, costs, penalties, fees, attorneys' fees, and/or obligations of any nature whatsoever (including "Unknown Claims" as defined below), whether at law or in equity. accrued or unaccrued, whether previously existing, existing now or arising in the future, whether direct, individual, representative, or class, of every nature, kind and description whatsoever, based on any federal, state, local, statutory or common law or any other law, rule or regulation, including the law of any jurisdiction outside the United States, against the Released Parties, or any of them, relating in any way to any conduct prior to the date of the Preliminary Approval Order and that: (a) is or are based on any act, omission, inadequacy, statement, communication, representation (express or implied), harm, injury, matter, cause, or event of any kind related in any way to any Covered Class Product; (b) involves legal claims related to the Covered Class Products that have been asserted in the Actions or could have been asserted in the Actions; or (c) involves the advertising, marketing, promotion, purchase, sale, distribution, design, testing, manufacture, application, use, performance, warranting, communications or statements about the Covered Class Products, packaging or Labeling of the Covered Class Products (collectively, the "Released Claims").

Notice of the Court's final judgment will be effected by posting it on the Settlement Administrator's website and by posting a copy of the final judgment and final approval order on the Settlement Administrator's website at www.Cpluscollagenlawsuit.com. The full Settlement Agreement is available at www.Cpluscollagenlawsuit.com. The Settlement Agreement describes the Releasing Parties, Released Parties, and Released Claims with specific descriptions, in necessarily accurate legal terminology, so please read it carefully. You can talk to one of the lawyers listed below for free or you can, of course, talk to your own lawyer if you have questions about the Released Claims or what they mean.

# HOW TO GET A CASH PAYMENT—SUBMITTING A VALID CLAIM FORM

# 9. How can I get a cash payment?

To ask for a Cash Award you must complete and submit a Valid Claim Form along with the required supporting documentation, if you have it. You can get a Claim Form at www.Cpluscollagenlawsuit.com. You may also submit your claim via the website. The Claim Form describes what you must provide to prove your claim and receive a Cash Award and generally requires information regarding the quantity of Class Products you purchased during the Class Period. Please read the instructions carefully, fill out the Claim Form, and either submit it online at www.Cpluscollagenlawsuit.com or mail it postmarked no later than, September 27, 2024, to:

DDG C Plus Collagen Settlement Administrator P.O. Box 3553 Baton Rouge, LA 70821

The Settlement Administrator may seek additional information to validate the Claim Form and/or disqualify an invalid Claim. If you provide incomplete or inaccurate information, your Claim may be denied.

# 10. When will I get my payment?

Payments will be sent to Settlement Class Members who send in Valid Claim Forms on time, after the Court grants "final approval" of the Settlement, and after the time for appeals has ended and any appeals have been resolved. If the Court approves the Settlement after a hearing on **October 31, 2024** (see the section "The Court's Fairness Hearing" below), there may be appeals. Resolving these appeals can take time. Please be patient.

### EXCLUDING YOURSELF FROM THE SETTLEMENT

If you want to keep the right to sue or continue to sue Defendant over the legal issues in this case, you must take steps to get out of the Settlement. This is called asking to be excluded from—sometimes called "opting out" of—the Settlement Class. If you exclude yourself from the settlement, you will not be entitled to receive any money from this lawsuit.

# 11. If I exclude myself, can I get anything from the Settlement?

If you ask to be excluded, you will not get a Cash Award under the Settlement, and you cannot object to the Settlement. But you may be part of a different lawsuit against Defendant in the future. You will not be bound by anything that happens in this lawsuit.

# 12. If I don't exclude myself, can I sue later?

No. Unless you exclude yourself, you give up the right to sue Defendant for the claims that this Settlement resolves. You must exclude yourself from *this* Class to start or continue your own lawsuit.

QUESTIONS? CALL 1-844-931-3243 OR VISIT www.Cpluscollagenlawsuit.com. PARA UNA NOTIFICATIÓN EN ESPAÑOL, VISITE NUESTRO SITIO DE INTERNET

# 13. How do I get out of the Settlement?

To opt out of the Settlement, you must send a letter by mail saying that you want to be excluded from *Kandel, et al. v. Dr. Dennis Gross Skincare, LLC, U.S.* District Court for the Southern District of New York, Case No. 1:23-cv-01967-ER. Be sure to include your name, address, telephone number, the approximate date of purchase, and your signature. You can't ask to be excluded at the website or on the phone. You must mail your opt out request postmarked no later than **September 27, 2024,** to:

DDG C Plus Collagen Settlement Administrator P.O. Box 3553 Baton Rouge, LA 70821

Requests to opt out that do not include all required information and/or that are not submitted on a timely basis, will be deemed null, void, and ineffective. Settlement Class Members who fail to submit a valid and timely Request for opting out on or before the deadline above shall be bound by all terms of the Settlement and any Final Judgment entered in this litigation if the Settlement is approved by the Court, regardless of whether they ineffectively or untimely requested exclusion from the Settlement.

### OBJECTING TO THE SETTLEMENT

# 14. How do I tell the Court I don't like the proposed Settlement?

To object to the Settlement, you or your attorney must send a written objection ("Objection") to the Settlement Administrator showing the basis for your objections. Your objection must contain the following information:

- (i) A caption or title that clearly identifies the Action (*Kandel, et al. v. Dr. Dennis Gross Skincare, LLC*, Case No. 1:23-cv-01967-ER (S.D.N.Y.) and that the document is an objection;
- (ii) Your name, current address, and telephone number or your lawyer's name, address, and telephone number if you are objecting through counsel;
- (iii) What Product(s) you bought during the Class Period;
- (iv) a clear and concise statement of the Class Member's objection, as well as any facts and law supporting the objection,
- (v) If applicable, the identity of any other objections you or your counsel (if you have counsel) submitted to any other class action settlements within the past five years including the case name, case number, and court, the general nature of such prior objection(s), and the outcome of said prior objection(s) (or a statement that you and/or your attorneys have submitted no such objections);
- (vi) Your signature attesting that all facts are true and correct; and
- (vii) If applicable, the signature of your counsel (the "Objection").

Any Objection to the Settlement must be postmarked on or before the Objection Deadline and sent to the Settlement Administrator at the addresses set forth in the Class Notice. The Court may, but is not required to, hear Objections in substantial compliance with these requirements, so Settlement Class Members should satisfy all requirements.

You or your lawyer may, but are not required to, appear at the Final Approval Hearing. If you or your lawyer wish to appear at the Final Approval Hearing, you must file with the Court a Notice of Intention to Appear along your written objection no later than **September 27**, **2024**. You must file your Notice of Intention to Appear by certified mail or in person, along with any other supporting materials to: Clerk, United States District Court for the Southern District of New York, 40 Foley Square, New York, NY 10007. Your written Objection must be marked with the Case name and Case Number (*Kandel, et al. v. Dr. Dennis Gross Skincare, LLC*, Case No. 1:23-cv-01967-ER, U.S. District Court for the Southern District of New York). In addition, you must also send copies of all documents you file with the Court to:

# **CLARKSON LAW FIRM, PC.**

Ryan J. Clarkson, Esq. Yana Hart, Esq. Tiara Avaness, Esq. 22525 Pacific Coast Highway Malibu, CA 90265 DDG@Clarksonlawfirm.com

The Court may only require substantial compliance with the requirements for submitting an objection. The requirement to submit a written objection may be waived upon a showing of good cause.

# **OBJECTION AND OPT-OUT DIFFERENCES**

# 15. What is the difference between objecting and opting out?

Objecting is simply telling the Court that you don't like something about the Settlement. You can object only if you stay in the Class. If you stay in the Class, you will be legally bound by all orders and judgments of the Court, and you won't be able to sue, or continue to sue, Defendant as part of any other lawsuit involving the same claims that are in this lawsuit. Opting out is telling the Court that you don't want to be part of the Class. If you opt out, you have no basis to object because the case no longer affects you. You cannot both opt out of and object to the Settlement. If a person attempts to do both, the Court will treat the submissions as an opt-out.

# THE LAWYERS REPRESENTING YOU

# 16. Do I have a lawyer in the case?

The Court has designated Ryan J. Clarkson, Yana Hart, and Tiara Avaness of Clarkson Law Firm, P.C., 22525 Pacific Coast Highway, Malibu, CA 90265 to represent you as "Class Counsel." You will not be charged for these lawyers. If you want to be represented by another lawyer, you may hire one to appear in Court for you at your own expense.

# 17. How will the costs of the lawsuit and Settlement be paid?

The Settlement Administrator's and costs and fees associated with administering the Settlement, including all costs associated with the publication of the Notice of Settlement will be paid out of the Settlement Fund and shall not exceed \$399,324, plus postage. Class Counsel's reasonable attorneys' fees and costs related to obtaining the Settlement consistent with applicable law will also be paid out of the Settlement Fund, subject to Court approval.

The three Settlement Class Representatives will also request that the Court approve a payment to them of up to \$5,000 each, a total of \$15,000, from the Settlement Fund, as service awards for their participation as the Settlement Class Representatives—for taking on the risk of litigation, and for settlement of their individual claims as Settlement Class Members in the settled Actions. The amounts are subject to Court approval and the Court may award less.

## THE COURT'S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the settlement. If you have filed an objection on time, you may attend and you may ask to speak, but you don't have to.

# 18. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Fairness Hearing at 10:30 a.m. on October 31, 2024, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, Courtroom 619. The hearing may be moved to a different date or time without additional notice, so please check for updates at www.Cpluscollagenlawsuit.com. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are objections, the Court will consider them. In order to speak at the Fairness Hearing, you must file a notice of intention to appear with the Clerk. The Court will also decide how much to pay the Settlement Class Representatives and the lawyers representing Settlement Class Members. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take.

# 19. Do I have to come to the hearing?

No. Class Counsel will answer any questions the judge may have. But you are welcome to come at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as you mailed your written objection on time, the Court will consider it. If you have sent an objection but do not come to the Court hearing, however, you will not have a right to appeal an approval of the Settlement. You may also pay another lawyer to attend on your behalf, but it's not required.

# 20. May I speak at the hearing?

You may ask the Court for permission to speak at the Fairness Hearing. To do so, you must send a letter saying that it is your "Notice of Intent to Appear" in the *Kandel, et al. v. Dr. Dennis Gross Skincare, LLC,* litigation. Be sure to include your name, address, telephone number, and your signature as well as the name, address and telephone number of any lawyer representing you (if applicable). Your Notice of Intent to Appear must be postmarked no later than no later than **September 27, 2024**, and be sent to the addresses listed in Questions 13 and 14. You cannot speak at the hearing if you excluded yourself from the Class.

### IF YOU DO NOTHING

# 21. What happens if I do nothing at all?

If you are a Settlement Class member and do nothing, you will not receive a payment from this Settlement. And, unless you exclude yourself, you won't be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendant about the claims in this case, ever again.

# **GETTING MORE INFORMATION**

# 22. How do I get more information?

This notice summarizes the proposed Settlement. More details are in the Settlement Agreement. You can get a copy of the Settlement Agreement, download a Claim Form, and review additional case information at www.Cpluscollagenlawsuit.com. You may also call toll-free 1-844-931-3243.

PLEASE DO NOT TELEPHONE THE DEFENDANT, THE COURT, OR THE COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

BY ORDER OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

Case 1:23-cv-01967-ER

DDG C Plus Collagen Settlement Administrator P.O. Box 3553 Baton Rouge, LA 70821 Document 83-3 Filed 10/17/24 Page 18 of 20

Your Claim Form Must Be Postmarked On or Before 9/27/2024

Kandel v. Dr. Dennis Gross Skincare, LLC
U.S. District Court for the Southern District of New York, Case No. 21-cv-01967-ER

# **Claim Form**

SAVE TIME AND SELECT YOUR PREFERRED PAYMENT METHOD
- Submit online at www.Cpluscollagenlawsuit.com

# GENERAL CLAIM FORM INFORMATION

If you purchased any of Dr. Dennis Gross Skincare, LLC's "C+Collagen" Products (the "Class Products") in the United States, for personal or household use and not for resale or distribution between March 10, 2016, and June 28, 2024 (collectively referred to as the "Settlement Class"), you may be eligible to participate in the benefits of the proposed settlement in *Kandel v. Dr. Dennis Gross Skincare, LLC*. To participate, you must fill this claim form out completely and either (i) mail it to the address given below, or (ii) submit it online through the Settlement website below. This Claim form must be postmarked or electronically filed no later than September 27, 2024. If you provide incomplete or inaccurate information, your claim may be denied.

Please read the full notice of this settlement (available at) carefully before filling out this Form.

To be eligible to receive any benefits from the settlement obtained in this class action lawsuit, you must complete or submit your claim form online or by mail:

**ONLINE**: Visit www.Cpluscollagenlawsuit.com and submit your claim online; or

MAIL: DDG C Plus Collagen Settlement Administrator, P.O. Box 3553, Baton Rouge, LA 70821

Keep a copy of your completed Claim Form for your records. Any documents you submit with your Claim Form cannot be returned. If your claim is rejected for any reason, the Settlement Administrator will notify you of the rejection and the reasons for such rejection.

Part A: Claimant Information					
First Name		Middle Initial			
Last Name		Suffix			
Mailing Address: Street Address/ P.O. Box (include Apartment/Suite/Fl	oor Number)				
City	State	Zip Code			

# **Part B: Purchase Information**

To be eligible for a payment you must not have previously received a refund for your purchase of the Class Product.

To qualify for cash, you must have purchased one or more Class Products.

- a. If you provide a receipt or other proof of purchase for the Class Products, you will receive a cash refund of Fifty Dollars (\$50) per Class Product purchased with a cap of ten (10) Class Products.
- b. If you do not provide a receipt or other proof of purchase for the Class Products, but complete this Claim Form under penalty of perjury, you will receive a cash refund of Fifty Dollars (\$50) per Class Product purchased with a cap of two (2) Class Products.
- c. If the amount in the Net Settlement (net of costs of notice and settlement administration, Settlement Class Counsel's attorneys' fees and

litigation expenses and the service awards for Plaintiffs), is either less or more than the amount of the total cash claims submitted by Claimants, the claims of each Claimant will be decreased or increased, respectively, <i>pro rata</i> , to ensure the Settlement Fund is exhausted, with							
no reversion from the Settlement Fund to Defendant. <i>Pro rata</i> upward adjustment of cash claims shall be capped at one hundred dollars							
(\$100) per Class Product. Any amounts remaining in the Net Settlement Fund after checks are issued and cashed or expired shall be disbursed							
cy pres.							
Please fill out the chart below identifying the purchase transaction(s) for which you are making a claim:							
Total Number of Class Products							
Write the <b>total number</b> of Class Products you purchased in the United States between March 10, 2016 and June 28, 2024 in the chart below:							
Products Purchased	Check all that apply	Quantity of Products	Approximate Date of Purchase (Month and Year)				
C+Collagen Serum							
C+Collagen Eye Cream							
C+Collagen Mist							
C+Collagen Deep Cream							
C+Collagen Mask							
Please choose one of the following:							
(a) Check here if you are uploading or mailing Proof of Purchase documentation with this claim form:							
If you are submitting this Claim Form by mail, please mail a copy of your receipt(s) memorializing the purchase of the Class Products along with this Claim Form to DDG C Plus Collagen Settlement Administrator, P.O. Box 3553, Baton Rouge, LA 70821.							
(b) Check here if you a	re making a claim wi	thout a Proof of Pur	chase (limit of two claims without proof of purchase).				
*Failure to include Proof of Purchase	e for claims for which	a Proof of Purchase i	s required will result in the reduction of your claims.				
*Submission of false or fraudulent in	formation will result i	n the claim being rejo	ected in its entirety.				
Part C: Attestation Under Penalty of Perjury							
I declare under penalty of perjury under the laws of the United States of America that I purchased the products listed between March 10, 2016 and June 28, 2024 that all of the information on this Claim Form is true and correct to the best of my knowledge. I understand that my Claim Form may be subject to audit, verification, and Court review and that I may be required to provide additional information to establish that my							

claim is valid. I also understand that by submitting this claim, I am releasing all Released Claims, as detailed in the Notice of the Proposed Class Action Settlement.

Signature:	Date:	/	

# REMINDER CHECKLIST

Before submitting this Claim Form, please make sure you:

- 1. Complete all fields in the Claimant Information section of this Claim Form in Part A.
- 2. Complete Part B, indicating the number of Class Products you purchased and enclosing your receipt(s).
- 3. Sign the Attestation under penalty of perjury in Part C. You must sign the Attestation to be eligible to receive benefits.
- 4. Keep a copy of your Claim Form and supporting documentation for your records.
- 5. If you desire an acknowledgment of receipt of your Claim Form, please complete the online Claim Form or mail this Claim Form via Certified Mail, Return Receipt Requested.
- 6. If you move or your name changes, please email your new address, new name or contact information to info@cpluscollagenlawsuit.com. **Keep a copy of your Claim Form for your records.**



**EAG Gulf Coast, LLC** 

Exhibit D: Reminder Email Notice

Subject: Reminder Notice of Settlement: Kandel, et al. v. Dr. Dennis Gross Skincare, LLC

From: DDG C Plus Collagen Settlement Administrator notice@pnclassaction.com

Reply-To: info@cpluscollagenlawsuit.com

To: Test@email.com

# REMINDER LEGAL NOTICE BY ORDER OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

Kandel, et al. v. Dr. Dennis Gross Skincare, LLC, No. 1:23-cv-01967-ER U.S. District Court for the Southern District of New York

If you bought any of Dr. Dennis Gross Skincare, LLC's "C+Collagen" Products Between March 10, 2016, and June 28, 2024, you may be entitled to payment.

The filing deadline is ending soon. Click here to file a claim.

# What Is This Notice About?

This Notice is to inform you of the settlement of the class action lawsuit referenced above (the "Action") with Dr. Dennis Gross Skincare LLC ("Defendant" or "DDG"). Plaintiffs in this lawsuit claim that Defendant deceptively labeled its "C+Collagen" products as containing "Collagen," when in fact, they did not contain any collagen. Defendant denies all claims in the lawsuit and denies that it did anything unlawful or improper. The Court did not rule in favor of either side. Rather, the parties have agreed to settle the lawsuit to avoid the uncertainties and expenses associated with ongoing litigation.

# Am I A Member of The Class?

You are a Settlement Class member if purchased any of Defendant's "C+Collagen" products in the United States, for personal or household use and not for resale or distribution, including DDG's C+Collagen Deep Cream, C+Collagen Serum, C+Collagen Mist, C+Collagen Eye Cream and C+Collagen Mask, and any other products sold with the C+Collagen label, whether sold alone or in combination with other products ("Class Products"), between March 10, 2016, and June 28, 2024, (the "Class Period").

# What Does the Settlement Provide?

With Court approval, the Settlement provides a Cash Award to Settlement Class Members that submit a valid and timely <u>Claim Form</u>. Settlement Class Members who previously purchased any of the Class Products during the Class Period may submit a claim to

receive Fifty Dollars (\$50) per Class Product purchase, capped at two (2) or ten (10) Class Products, depending on whether they submit proof of purchase.

If the amount in the Net Settlement Fund (net of costs of notice and settlement administration, Settlement Class Counsel's attorneys' fees and litigation expenses and the service awards for Plaintiffs), is either less or more than the amount of the total cash claims submitted by Claimants, the claims of each Claimant will be decreased or increased, respectively, *pro rata*, to ensure the Settlement Fund is exhausted, with no reversion from the Settlement Fund to Defendant. *Pro rata* upward adjustment of cash claims shall be capped at one hundred dollars (\$100) per Class Product. Any amounts remaining in the Net Settlement Fund after checks are issued and cashed or expired shall be disbursed *cy pres*. Those Settlement Class Members whose payments are not cleared within one hundred and eighty (180) calendar days after issuance will be ineligible to receive a cash settlement benefit and the Settlement Administrator will have no further obligation to make any payment from the Settlement Fund pursuant to this Settlement Agreement or otherwise to such Settlement Class Member.

# What Are My Rights and Options? You have three options:

<u>You Can Make a Claim.</u> Settlement Class Members who wish to receive a Cash Award must submit a Claim Form by visiting the Settlement Website, <u>www.Cpluscollagenlawsuit.com</u>, and submitting a Claim Form (which can also be printed and mailed). The deadline to **postmark or submit your claim online is September 27, 2024**.

<u>You Can Object to the Settlement.</u> You may also object to any part of this Settlement. Objections must be mailed to the Settlement Administrator and **postmarked no later than September 27, 2024**.

You Can "Opt-Out" of the Settlement. You can exclude yourself ("opt-out") of the Settlement by submitting an exclusion request to the Settlement Administrator that is postmarked no later than September 27, 2024. This is the only option that allows you to be part of any other lawsuit against Defendant about the legal claims in this case.

Details about how to opt-out, object, and submit your Claim Form are available on the <u>Settlement Website</u>.

# The Fairness Hearing

On October 31, 2024 at 10:30 am, the Court will hold a hearing at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, Courtroom 619, to approve: (1) the Settlement as fair, reasonable, and adequate; and (2) the application for Plaintiffs' attorneys' fees and litigation costs of up to \$3,900,000, and payment of up to \$15,000 in total to the three Settlement Class Representatives. Settlement Class Members who support the proposed settlement do not need to appear at the hearing or take any other action to indicate their approval.

## **How Can I Get More Information?**

This is only a summary of the settlement. If you have questions or want to view the detailed notice or other documents about the Litigation, including the Settlement Agreement visit <a href="www.Cpluscollagenlawsuit.com">www.Cpluscollagenlawsuit.com</a>, contact the Settlement Administrator by calling <a href="mailto:1-844-931-3243">1-844-931-3243</a>, by emailing <a href="mailto:info@cpluscollagenlawsuit.com">info@cpluscollagenlawsuit.com</a>, or by writing to DDG C Plus Collagen Settlement Administrator, P.O. Box 3553, Baton Rouge, LA 70821, or contact Class Counsel at DDG@Clarksonlawfirm.com.

DDG C Plus Collagen Settlement Administrator P.O. Box 3553 Baton Rouge, LA 70821 Unsubscribe - Unsubscribe Preferences



**EAG Gulf Coast, LLC** 

Exhibit E: Digital Notice

ENTERTAINMENT

CRIME

**HUMAN INTEREST** 

LIFESTYLE

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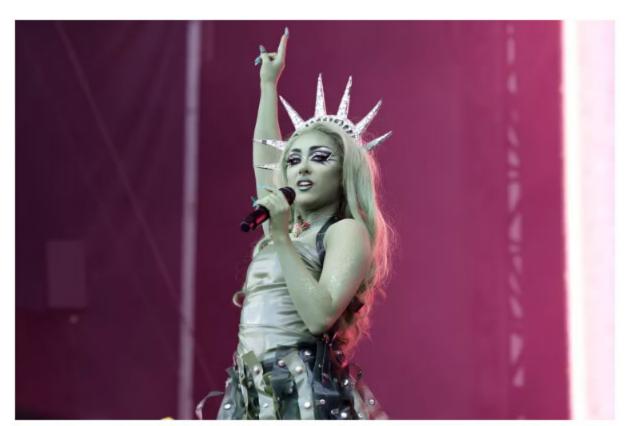
LIFESTYLE > BEAUTY & STYLE > CELEBRITY HAIR

# Chappell Roan's Marie Antoinette Wig Slid Off During Her Show, but She Played It Cool

The singer let her curls loose after the incident, which happened at a show in Chicago on July 31

By Michelle Lee Published on August 1, 2024 04:48PM EDT

□ COMMENTS

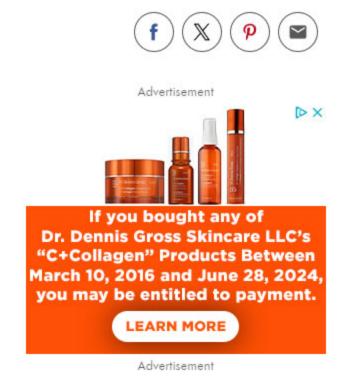


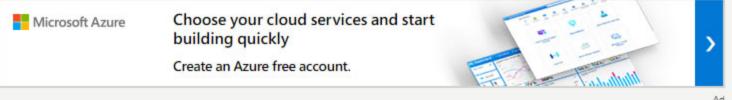
Chappell Roan in June 2024. PHOTO: MARLEEN MOISE/GETTY

Chappell Roan was hot and ready to go when her wig fell off during a recent concert.

On July 31, the "Good Luck Babe" singer put on a performance at The Vic Theatre in Chicago as a part of the Lollapalooza Aftershows series.

In true pop star fashion, Roan, 26, stepped onto the stage in a Marie Antoinette-inspired look complete with a regal corset ball gown, Victorian makeup and a white hairpiece styled in a towering updo — which only

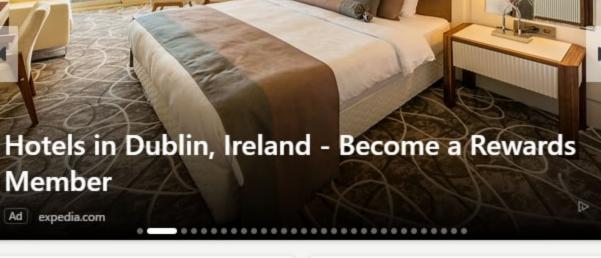




SPORTS GAMING LIFESTYLE SHOPPING AUTOS HEALTH

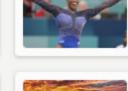
PARIS 2024: Katie Ledecky wins 13th medal, most ever for female Olympian in history







HAUPPAUGE / 86°F 
 NEWS ENTERTAINMENT MONEY



Simone Biles wins gold in women's gymnastics allaround final, while Suni L...







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Shopping

I left the U.S. for Thailand look inside my \$544/month apartment



FOOD TRAVEL VIDEO PLAY

If you bought any of **Dr. Dennis Gross Skincare** LLC's "C+Collagen" **Products Between** March 10, 2016 and June 28, 2024, you may be entitled to payment.

**LEARN MORE** 



I've worked on cruise ships for years. Here are 6 things passengers should stop...

INSIDER

\$ 146 P

113.459 votes



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Daily Poll (1 of 6)

Have you or your partner taken care of an ailing spouse?

I have

Partner has

No

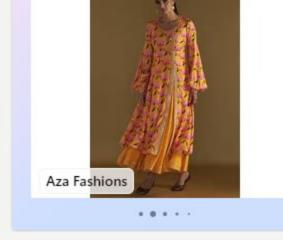
Not applicable



Putin's arrest tactics pay off as Russia brings home its own - even a killer

top The Washington Post

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Vladimir Kara-Murza was jailed in Russia, but it didn't silence him

The Washington Post

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Case L:23-cv-01967-FRyou Decument 83-51 DE 159 HV/5-6764s skings fellers  $\triangleright$   $\times$ "C+Collagen" Products Between March 10, 2016 and June 28, 2024, you may be entitled to payment.

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**OLYMPICS** 

2024 ELECTION

**WATCH LIVE** 





# **CULTURE & TRENDS**

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**PARIS 2024** 

Rapper Flavor Flav and Reddit co-founder Alexis Ohanian team up to help Olympian Veronica Fraley pay her rent



CULTURE & TRENDS

Johnny Cash statue to be unveiled in U.S. Capitol in September

# TOP VIDEO



TODAY gets up close to the Mona Lisa - without the crowds



Get a first look at Universal's new Ministry of Magic universe



French fashion 101: How styles in Paris make waves in wardrobes



Ina Garten takes TODAY on a tour of her favorite market in Paris

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If you bought any of Dr. Dennis Gross Skincare LLC's "C+Collagen" Products Between March 10, 2016 and June 28, 2024, you may be entitled to payment.

**LEARN MORE** 



Who are the U.S. residents released in the Russian prisoner swap?

In the largest prisoner exchange with Russia since 2010, four U.S. residents were released.

ELECTIONS 4:09 p.m. ET Aug. 1



With this Olympic gold, Simone Biles has now surpassed all other GOATs

NANCY ARMOUR 4:45 p.m. ET Aug.



Hurricane forecasters worried about storm heading toward Florida WEATHER 4:17 p.m. ET Aug. 1



How families are paying



LIVE

# Olympic gymnastics live results: Simone Biles wins gold in all-around

Simone Biles has won another gold medal at the 2024 Paris Olympics, this one in the women's gymnastics all-around final. See how she won.

OLYMPICS 5:05 p.m. ET Aug. 1



# Jonathan Majors reacts to Marvel replacing him with Robert Downey Jr.

Jonathan Majors has broken his silence on Marvel swapping him out for Robert Downey Jr. as its next "Avengers" villain. MOVIES 8:38 a.m. ET Aug. 1



# Hey, Trump? No one likes Vance. Try again.

GOP vice presidential candidate JD Vance is, in the parlance of political strategists, 'not good.' He's an unlikable misogynist, and he needs to go.

COLUMNISTS Rex Huppke 4:06 a.m. ET Aug. 1



Suspect in cold case died by suicide after police link him to murder

Albert Lauro Jr., a 57-year-old suspect in the

# Top Headlines

Sharon Stone shows off black eye after smacking face on marble floor

Are your kids singing the new alphabet song? Here's why it changed

Olympic swimmers are wearing big parkas before racing. Here's why

Florida dad accused of leaving 10-year-old daughter on side of road

Cardi B announces pregnancy after filing for divorce from Offset

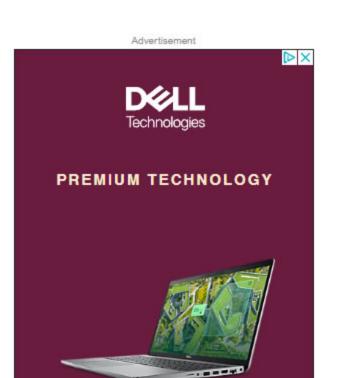
Beshear, Kelly, Shapiro? GOP should fear this Harris VP option.

OPINION Dace Potas

Former CNN anchor Don Lemon sues Elon Musk over canceled X deal

Richard Simmons' staff hit back at controversial Pauly Shore comments

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Cet 1:23-cv-01967-B Document 83-5 Filed 10/17/24 Page 6 of 12

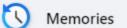










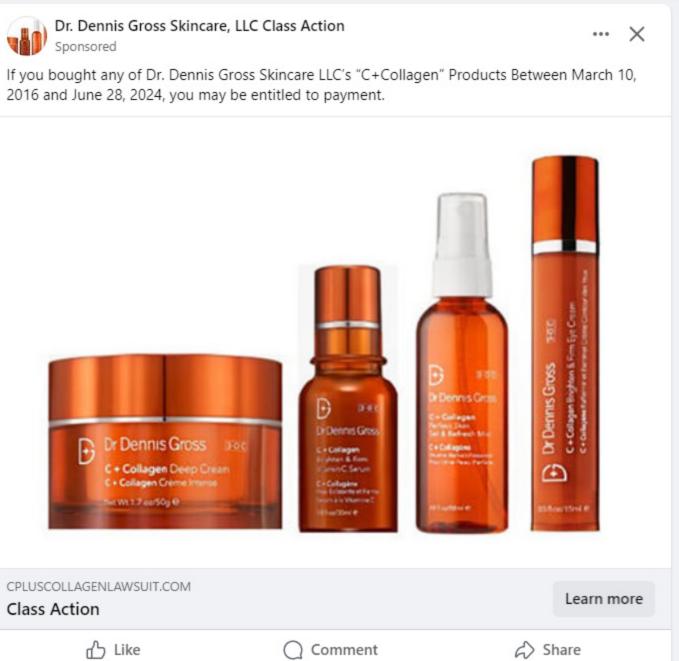








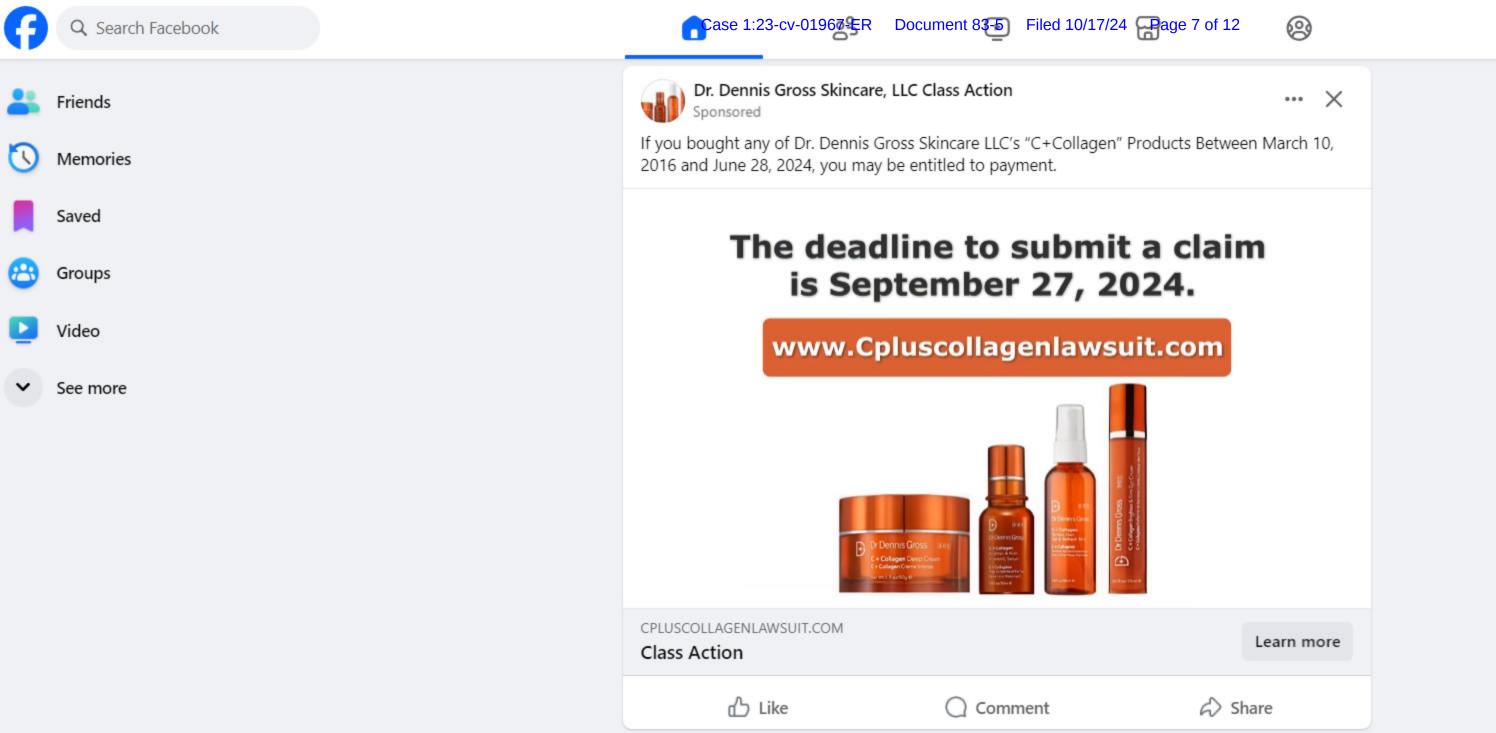
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skincare class action If you bought any of Dr. Dennis

Gross Skincare LLC's "C+Collagen" Products Between March 10, 2016 and June 28, 2024, you may be

entitled to payment.

Document 83-5 Filed 10/17/24



Sponsored

Case 1:23-cv-01967-ER

# The C+Collagen Products include:

- C+Collagen Deep Cream C+Collagen Serum
- C+Collagen Mist
- C+Collagen Eye Cream
- C+Collagen Mask Any other products sold
- with the C+Collagen label, whether sold alone or in combination with other products.



Page 9 of 12

# Visit www.Cpluscollagenlawsuit.com for more information.

# $\triangle \bigcirc \triangle$

entitled to payment.

Learn more







skincare class action If you bought any of Dr. Dennis

Gross Skincare LLC's "C+Collagen" Products Between March 10, 2016 and June 28, 2024, you may be

# -01967 ERed Document 83-5 Filed 10/17/24

If you bought any of Dr. Dennis Gross Skincare LLC's "C+Collagen" Products Between March 10, 2016 and June 28, 2024, you may be entitled to payment.



cpluscollagenlawsuit.com

Learn More







# Products must have been purchased between March 10, 2016, and June 28, 2024.

# The C+Collagen Products include:

- C+Collagen Deep Cream
- C+Collagen Serum
- C+Collagen Mist
- C+Collagen Eye Cream
- C+Collagen Mask
- Any other products sold with the C+Collagen label, whether sold alone or in combination with other products.





# Visit www.Cpluscollagenlawsuit.com for more information.











If you bought any of Dr. Dennis Gross
Skincare LLC's "C+Collagen" Products
Between March 10, 2016 and June 28,







**EAG Gulf Coast, LLC** 

Exhibit F: Sponsored Search Notice

Forums

Web



# Dr. Dennis Gross settlement

Images



: More







Tools

Sponsored

News



www.cpluscollagenlawsuit.com/

# Dr. Dennis Gross Skincare, LLC | Class Action Settlement

Shopping

C+Collagen products bought between March 2016 and June 2024 may be eligible. Act now to claim your payment from Dr. Dennis Gross Skincare, LLC's settlement.

Videos



cpluscollagenlawsuit.com

https://www.cpluscollagenlawsuit.com

# Kandel, et al v. Dr. Dennis Gross Skincare, LLC. - UNITED ...

**Dennis Gross** Skincare LLC's "C+Collagen" Products between March 10, 2016, and June 28, 2024, then you may be entitled to **payment**. Submit a **Claim**. **Settlement** ...



PR Newswire

https://www.prnewswire.com > news-releases > if-you-bo...

# If You Bought Any of Dr. Dennis Gross Skincare, LLC's "C ...

Settlement Class Members who previously purchased any of the Class Products during the Class Period may submit a claim to receive Fifty Dollars (\$50) per Class ...



Longview News-Journal

https://www.news-journal.com > if-you-bought-any-of-...

# If You Bought Any of Dr. Dennis Gross Skincare, LLC's "C ...

3 days ago — **Dennis Gross** Skincare LLC ("Defendant" or "DDG"). Plaintiffs in this **lawsuit claim** that Defendant deceptively labeled its "C+Collagen" products ...



website-files.com

https://cdn.prod.website-files.com > ... PDF

# If you bought any of Dr. Dennis Gross Skincare, LLC's "C+ ...

Jun 28, 2024 — A **settlement** has been reached between **Dr**. **Dennis Gross** Skincare, LLC ("Defendant" or "DDG") and. Jami Kandel, Mocha Gunaratna, ...









Shopping

News

Videos

Images

Forums

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: More

Tools

# Sponsored



www.cpluscollagenlawsuit.com/ :

# Purchased C+Collagen Products? | You May Be Entitled to Payment

Dr. Dennis Gross Skincare, LLC class action settlement. Visit the Settlement Website to learn more.



Dr. Dennis Gross Skincare

https://drdennisgross.com > collections > c-collagen



# C+ Collagen

C + CollagenTM. Skin brightening & firming vitamin C treatments. Revive dull ... Full refund within 30 days, no worries. Get 15% OFF your first order ...

Free delivery · Free 30-day returns



Cleveland Clinic Health Essentials

https://health.clevelandclinic.org > collagen-supplements

# Collagen Supplements: Benefits and Side Effects

But remember: Research doesn't necessarily **back** up the benefits of **collagen** supplements. ... "It's also helpful to use topical antioxidants (like vitamins **C** and E) ...



# NativePath

https://www.nativepath.com > return-policy-nativepath :

# Refund & Return Policy

May 1, 2023 — Returns must be received at our warehouse within 365 days from the delivery date to be considered for a refund. Sealed, unopened products will ...



National Institutes of Health (NIH) (.gov)

https://pubmed.ncbi.nlm.nih.gov > ...

# Collagen Peptides, in Association with Vitamin C, Sodium ...

by G Farì · 2022 · Cited by 27 — Conclusion: The combination of rehabilitation based on McKenzie **back** exercises and oral viscosupplementation with Fortigel®, Vitamin **C**, sodium...



Glendale Community College

https://www.glendale.edu > financial-aid-fees > refunds

# Refunds

**Refunds** are automatic for those students who withdraw/drop unit(s) by the due date listed in the schedule of classes and on the GCC website. There is a \$10 ...



Amazon.com

https://www.amazon.com > Klean-Athlete-Collagen-Pep...

# Klean ATHLETE Klean Collagen+C - Collagen Peptides ...

... **refund** or replacement through Your Orders by providing an image of the item and its defects. Read full **return** policy. **Returns**. Non-returnable due to Food ...

★★★★ Rating: 4.5 · 168 reviews · \$43.92 \$49 With promotion · Free delivery · 30-day returns · In stock



Q

Dr. Dennis Gross settlement

Case 1:23-cv-01967-ER

Document 83-6





Q SEARCH

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SHOPPING

: MORE

TOOLS

About 379,000 results



cpluscollagenlawsuit.com

https://www.cpluscollagenlawsuit.com •

# Dr. Dennis Gross Skincare, LLC | Class Action Settlement

Ad C+Collagen products bought between March 2016 and June 2024 may be eligible. Act now to claim your payment from Dr. Dennis Gross Skincare, LLC's settlement.



drdennisgross.com

https://drdennisgross.com/official-site/skincare •

# Dr. Dennis Gross Skincare™ | Official Site

Ad Innovative Skincare Options that Offer Effective & Visible Results. Dermatologist Created. See Visible Results with Advanced Ingredient Combinations & Medical Grade Formulas.

#### **EXPLORE FURTHER**

Dr. Dennis Gross Skincare Review - Must Read This ... honestbrandreviews.com

LEGAL NOTICE: If you purchased skincare products ... prnewswire.com

Class Action: Grande Cosmetics Lash, Brow Serums Are ... classaction.org

J DR. DENNIS GROSS SKINCARE LLC v. HBA&MFL NY LLC dockets.justia.com

Dr. Dennis Gross Review: A Review of The 10 Best Dr. ... thedermreview.com

Recommended to you based on what's popular . Feedback



claimdepot.com

https://www.claimdepot.com/settlements/dr-dennis... \*

# Dr. Dennis Gross Skincare \$9.2M False Advertising Settlement

WEB 4 days ago · If you purchased any of **Dr**. **Dennis Gross** Skincare, LLC's "C+Collagen" products between March 10, 2016, and June 28, 2024, you may be eligible to claim up to ...



PR Newswire

https://www.prnewswire.com/news-releases/if-you... \*

# If You Bought Any of Dr. Dennis Gross Skincare, LLC's ...

WEB 4 days ago · This Notice is to inform you of the **settlement** of the class action lawsuit referenced above (the "Action") with **Dr**. **Dennis Gross** Skincare LLC ("Defendant" or ...

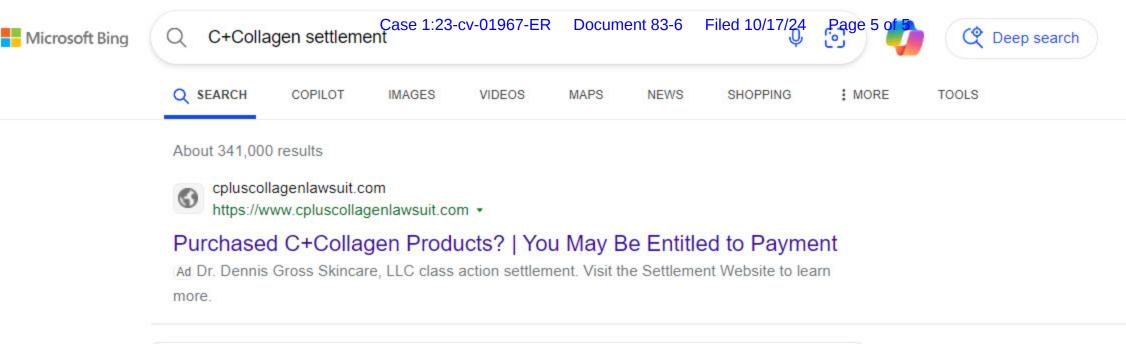


Bloomberg Law News

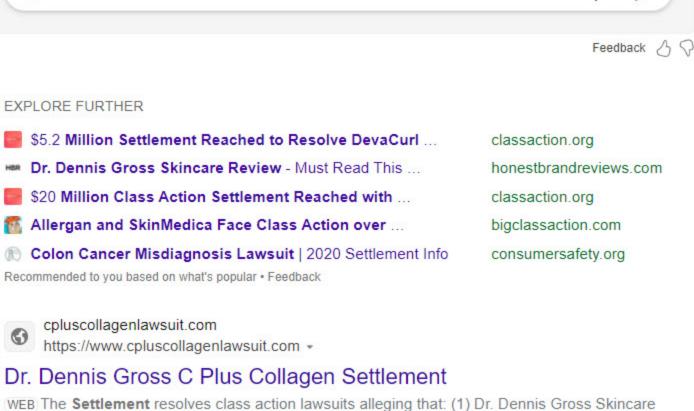
https://news.bloomberglaw.com/litigation/dr-dennis... \*

# Dr. Dennis Gross Skincare Inks \$9.2 Million Collagen Settlement

WEB Jun 26, 2024 · Dr. Dennis Gross Skincare LLC has agreed to settle claims its "C + Collagen"



# \$9,200,000 Dr. Dennis Gross Skincare, LLC has agreed to pay \$9,200,000 to settle a class action lawsuit for allegedly mislabeling their "C+Collagen" products as containing collagen when they did not 1. The lawsuit claims that consumers were misled into paying a premium for these products under the false belief that they contained collagen 1. 0 Learn more: 1 Dr. Dennis Gross Skincare \$9.2M False Dr. Dennis Gross Skincare Inks \$9.2 Advertising Settlement Million Collagen Settlement Claimdepot.com B news.bloomberglaw... What is collagen? How can I avoid such scams? What are the benefits of co Type a message...



owned, manufactured, and distributed products labeled as "C+Collagen" and purporting to





Collagen peptides also have a very unique **amino acid structure** which makes them more filling than other protein powders - up to 40% more when consuming the same quantity.



As a **supplement** or a cream, collagen is become experts predicting a \$16.7 billion boom in the global



**EAG Gulf Coast, LLC** 

Exhibit G: Press Release

# If You Bought Any of Dr. Dennis Gross Skincare, LLC's "C+Collagen" Products Between March 10, 2016 and June 28, 2024, You May Be Entitled to Payment

NEWS PROVIDED BY

DDG C Plus Collagen Settlement Administrator →

Jul 29, 2024, 08:00 ET

NEW YORK, July 29, 2024 /PRNewswire/ -- The following notice is being issued by the Clarkson Law Firm, P.C. and has been authorized by the United States District Court for the Southern District of New York, in *Kandel, et al. v. Dr. Dennis Gross Skincare, LLC* (No. 1:23-cv-01967-ER).

What Is This Notice About? This Notice is to inform you of the settlement of the class action lawsuit referenced above (the "Action") with Dr. Dennis Gross Skincare LLC ("Defendant" or "DDG"). Plaintiffs in this lawsuit claim that Defendant deceptively labeled its "C+Collagen" products as containing "Collagen," when in fact, they did not contain any collagen. Defendant denies all claims in the lawsuit and denies that it did anything unlawful or improper. The Court did not rule in favor of either side. Rather, the parties have agreed to settle the lawsuit to avoid the uncertainties and expenses associated with ongoing litigation.

**Am I A Member of The Class?** You are a Settlement Class member if purchased any of Defendant's C+Collagen products in the United States, for personal or household use and not for resale or distribution, including DDG's

C+Collagen Deep Cream, C+Collagen Serum, C+Collagen Mist, C+Collagen Eye Cream and C+Collagen

Mask, and any other products sold with the Case 1:23-cv-01967-ER Document 83-7 Filed 10/17/24 Page 3 of 42 C+Collagen label, whether sold alone or in combination with other products ("Class Products"), between March 10, 2016, and June 28, 2024 (the "Class Period").

What Does the Settlement Provide? With Court approval, the Settlement provides a Cash Award to Settlement Class Members that submit a valid and timely Claim Form. Settlement Class Members who previously purchased any of the Class Products during the Class Period may submit a claim to receive Fifty Dollars (\$50) per Class Product purchase, capped at two (2) or ten (10) Class Products, depending on whether they submit proof of purchase.

If the amount in the Net Settlement Fund (net of costs of notice and settlement administration, Settlement Class Counsel's attorneys' fees and litigation expenses and the service awards for Plaintiffs), is either less or more than the amount of the total cash claims submitted by Claimants, the claims of each Claimant will be decreased or increased, respectively, *pro rata*, to ensure the Settlement Fund is exhausted, with no reversion from the Settlement Fund to Defendant. *Pro rata* upward adjustment of cash claims shall be capped at one hundred dollars (\$100) per Class Product. Any amounts remaining in the Net Settlement Fund after checks are issued and cashed or expired shall be disbursed *cy pres*. Those Settlement Class Members whose payments are not cleared within one hundred and eighty (180) calendar days after issuance will be ineligible to receive a cash settlement benefit and the Settlement Administrator will have no further obligation to make any payment from the Settlement Fund pursuant to this Settlement Agreement or otherwise to such Settlement Class Member.

What Are My Rights and Options? You have three options:

You Can Make a Claim. Settlement Class Members who wish to receive a Cash Award must submit a Claim Form by visiting the Settlement Website, <a href="www.Cpluscollagenlawsuit.com">www.Cpluscollagenlawsuit.com</a>, and submitting a Claim Form (which can also be printed and mailed). The deadline to <a href="postmark">postmark</a> or submit your claim online is September 27, 2024.

<u>You Can Object to the Settlement</u>. You may also object to any part of this Settlement. Objections must be mailed to the Settlement Administrator and **postmarked no later than September 27, 2024**.

You Can "Opt-Out" of the Settlement. You can exclude yourself ("opt-out") of the Settlement by Case 1:23-cv-01967-ER. Document 83-7 Filed 10/17/24 Page 4 of 42 submitting an exclusion request to the Settlement Administrator that is **postmarked no later than**September 27, 2024. This is the only option that allows you to be part of any other lawsuit against Defendant about the legal claims in this case.

Details about how to opt-out, object, and submit your Claim Form are available on the **Settlement Website**.

# The Fairness Hearing

On October 31, 2024 at 10:30 a.m., the Court will hold a hearing at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, Courtroom 619 to approve: (1) the Settlement as fair, reasonable, and adequate; and (2) the application for Plaintiffs' attorneys' fees and litigation costs of up to \$3,900,000, and payment of up to \$15,000 in total to the three Settlement Class Representatives. Settlement Class Members who support the proposed settlement do not need to appear at the hearing or take any other action to indicate their approval.

# **How Can I Get More Information?**

This is only a summary of the settlement. If you have questions or want to view the detailed notice or other documents about the Litigation, including the Settlement Agreement visit <a href="www.Cpluscollagenlawsuit.com">www.Cpluscollagenlawsuit.com</a>, contact the Settlement Administrator at 1-844-931-3243 or by writing to DDG C Plus Collagen Settlement Administrator, P.O. Box 3553, Baton Rouge, LA 70821, or contact Class Counsel at DDG@Clarksonlawfirm.com.

SOURCE DDG C Plus Collagen Settlement Administrator

WANT YOUR COMPANY'S NEWS

# FEATURED ON PRNEWSWIRE.COM?

**GET STARTED** 

If You Bought Any of Dr. Dennis Gross Skincare, LLC's "C+Collagen" Products Between March 10, 2016 and June 28, 2024, You May Be Entitled to Payment

English PR Newswire ID: 4220698-1 Clear Time Jul 29, 2024 8:00 AM ET

View Release



109.9M

TOTAL POTENTIAL AUDIENCE

454

TOTAL EXACT MATCHES

TOP EXACT MATCH PICKUP

**BENZINGA** 

Benzinga

8M visitors/month [1]



KTLA [Los Ang...

7.1M visitors/month [1]

PR Newswire

**PR Newswire** 

5.6M visitors/month [1]



WFLA [Tampa, FL]

5M visitors/month [1]



Seeking Alpha



WJW-TV FOX-8 ...

4.1M visitors/month [1]



WXIN-TV FOX-5...

3.2M visitors/month [1]



KXAN-TV NBC-3...

2.8M visitors/month [1]



KTVI-TV FOX-2...

2.4M visitors/month [1]



WGN [Chicago,... 2.2M visitors/month [1]



KDVR [Denver,...



2.1M visitors/month [1]



WKRN [Nashvil... 2M visitors/month [1]





KSWB [San Die... 1.8M visitors/month [1]



KRON [San Fra...

1.8M visitors/month [1]



KLAS-TV CBS-8...

1.7M visitors/month [1]

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\*DATA SOURCES: [1] Similarweb [2] ALEXA, [3] SITEWORTHTRAFFIC.COM [4] CISION DIGITAL REACH

\*THE DATA CITED HERE BY SIMILARWEB REPRESENTS SITE TRAFFIC DATA OF WORLDWIDE UNIQUE VISITORS ON DESKTOP AND MOBILE DEVICES. DATA IS UPDATED MONTHLY.



Views & Engagement

Views & Engagement data will continue to mature over time. Totals below are expected to have reached 98% maturity when the circles below are darker in color.

1,512 CLICK-THROUGHS 7,946

RELEASE VIEWS



Distribution

# 892

TOTAL AP OUTLETS DISTRIBUTED

# TOP AP OUTLETS

# C-SPAN

86.2M Visitors/Month Washington, DC

#### Scribd, Inc.

43.5M Visitors/Month San Francisco, CA

#### FoxNews.com

32.5M Visitors/Month

New York, NY

# **CBS News Radio**

30M Visitors/Month

New York, NY

### New York Time...

29.9M Visitors/Month

New York, NY

#### Apple Inc.

29.7M Visitors/Month

Cupertino, CA

# CNBC.com

26.1M Visitors/Month

Englewood Cliffs, NJ

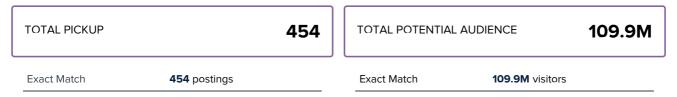
#### CBSnews.com

26.1M Visitors/Month

New York, NY

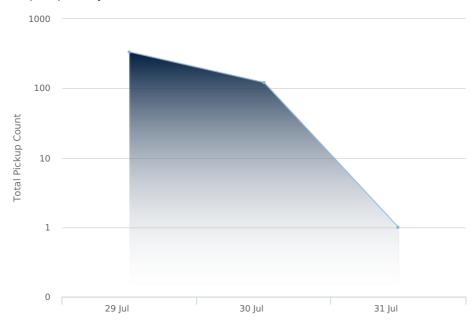
### **Pickup**

## Overview



## **Total Pickup Over Time**

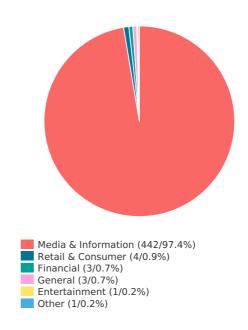
Total pickup since your content was distributed



#### Total Pickup by Source Type

# Newspaper (236/52.0%) Broadcast Media (184/40.5%) Online News Sites & Other Influencers (19/4.2%) Print Media (9/2.0%) Blog (2/0.4%) Other (4/0.9%)

#### Total Pickup by Industry



## **Exact Match Pickup**

Exact matches are full text postings of your content which we have found in the online and social media that we monitor. Understand how it is calculated.

Total Exact Matches: 454

Total Potential Audience: 109,861,761

Logo	Outlet Name	Location	Source Type	Industry	Potential Audience
BENZINGA	Benzinga Online ☐ View Release	United States	Online News Sites & Other Influencers	Financial	7,968,427 <sup>[1]</sup> visitors/month
KTLA 5	KTLA [Los Angeles, CA] Online ☐ View Release	United States	Broadcast Media	Media & Information	7,073,654 <sup>[1]</sup> visitors/month
PR Newswire	PR Newswire Online ☐ View Release	Global	PR Newswire	Media & Information	5,590,155 <sup>[1]</sup> visitors/month
News Channel on your side	WFLA [Tampa, FL] Online □ View Release	United States	Broadcast Media	Media & Information	4,950,418 <sup>[1]</sup> visitors/month
Seeking Alpha <sup>(1)</sup>	Seeking Alpha Online ☐ View Release	United States	Online News Sites & Other Influencers	Financial	4,371,062 <sup>[1]</sup> visitors/month
FOX 8	WJW-TV FOX-8 [Cleveland, OH] Online ☐ View Release	United States	Broadcast Media	Media & Information	4,127,594 <sup>[1]</sup> visitors/month
<b>FOX</b> 59	WXIN-TV FOX-59 [Indianapolis, IN] Online □ View Release	United States	Broadcast Media	Media & Information	3,161,353 <sup>[1]</sup> visitors/month
k xan	KXAN-TV NBC-36 [Austin, TX] Online □ View Release	United States	Broadcast Media	Media & Information	2,755,722 <sup>[1]</sup> visitors/month
KPLA	KTVI-TV FOX-2 [St. Louis, MO] Online	United States	Broadcast Media	Media & Information	2,367,016 <sup>[1]</sup> visitors/month
CHICAGO'S VERYOWN	WGN [Chicago, IL] Online ☐ View Release	United States	Broadcast Media	Media & Information	2,152,454 <sup>[1]</sup> visitors/month
OX 31 2 COLORADO'S EVERY OWN	KDVR [Denver, CO] Online □ View Release	United States	Broadcast Media	Media & Information	2,091,917 <sup>[1]</sup> visitors/month
WKRN COM	WKRN [Nashville, TN] Online □ View Release	United States	Broadcast Media	Media & Information	2,003,550 <sup>[1]</sup> visitors/month
FOX 5	KSWB [San Diego, CA] Online	United States	Broadcast Media	Media & Information	1,837,749 <sup>[1]</sup> visitors/month
KRON 4	KRON [San Francisco, CA] Online ☐ View Release	United States	Broadcast Media	Media & Information	1,774,145 <sup>[1]</sup> visitors/month
8 NEWSNOW	KLAS-TV CBS-8 [Las Vegas, NV] Online	United States	Broadcast Media	Media & Information	1,730,714 <sup>[1]</sup> visitors/month
FOX 8	WGHP [Greensboro, NC] Online □ View Release	United States	Broadcast Media	Media & Information	1,653,457 <sup>[1]</sup> visitors/month

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PIX (I) NEWYORKS VERY OWN	WPIX-TV CW-11 [New York, NY] Online □ View Release	United States	Broadcast Media	Media & Information	1,648,704 <sup>[1]</sup> visitors/month
NEWS	WHTM [Harrisburg, PA] Online ☐ View Release	United States	Broadcast Media	Media & Information	1,645,761 <sup>[1]</sup> visitors/month
ONYOURSDE VANY.com	WAVY-TV NBC-10 [Portsmouth, VA] Online ☐ View Release	United States	Broadcast Media	Media & Information	1,625,198 <sup>[1]</sup> visitors/month
.COM	KTVX [Salt Lake City, UT] Online ☐ View Release	United States	Broadcast Media	Media & Information	1,438,932 <sup>[1]</sup> visitors/month
FOX4	WDAF [Kansas City, MO] Online ☐ View Release	United States	Broadcast Media	Media & Information	1,417,348 <sup>[1]</sup> visitors/month
NBC41.com	WCMH [Columbus, OH] Online ☐ View Release	United States	Broadcast Media	Media & Information	1,404,208 <sup>[1]</sup> visitors/month
<b>ENEWS</b>	WRIC [Richmond, VA] Online □ View Release	United States	Broadcast Media	Media & Information	1,290,843 <sup>[1]</sup> visitors/month
WATCHING OUT FOR YOU	KOIN-TV CBS-6 [Portland, OR] Online  View Release	United States	Broadcast Media	Media & Information	1,243,184 <sup>[1]</sup> visitors/month
CBS17.COM	WNCN [Raleigh, NC] Online □ View Release	United States	Broadcast Media	Media & Information	1,148,400 <sup>[1]</sup> visitors/month
WOOD SHORT HAVE NO ANALYZOO	WOOD [Grand Rapids, MI] Online ☐ View Release	United States	Broadcast Media	Media & Information	1,147,492 <sup>[1]</sup> visitors/month
OKLAHOMAS NEWS	KFOR [Oklahoma City, OK] Online □ View Release	United States	Broadcast Media	Media & Information	1,135,961 <sup>[1]</sup> visitors/month
<b>FOX 40</b>	KTXL [Sacramento, CA] Online □ View Release	United States	Broadcast Media	Media & Information	1,089,889 <sup>[1]</sup> visitors/month
LOCAL KRQE REPORTING YOU CAN TRUST	KRQE [Albuquerque, NM] Online □ View Release	United States	Broadcast Media	Media & Information	968,199 <sup>[1]</sup> visitors/month
NEWS 8 wtnh.com	WTNH [New Haven, CT] Online □ View Release	United States	Broadcast Media	Media & Information	958,827 <sup>[1]</sup> visitors/month
WKBN 278	WKBN-TV CBS-27 [Youngstown, OH] Online ☐ View Release	United States	Broadcast Media	Media & Information	917,545 <sup>[1]</sup> visitors/month
600 WAT E.com	WATE [Knoxville, TN] Online □ View Release	United States	Broadcast Media	Media & Information	906,136 <sup>[1]</sup> visitors/month
WWLP.com	WWLP-TV NBC-22 [Springfield, MA] Online ☐ View Release	United States	Broadcast Media	Media & Information	895,235 <sup>[1]</sup> visitors/month
NEWS3 WRED MEMPHIS	WREG [Memphis, TN] Online □ View Release	United States	Broadcast Media	Media & Information	850,584 <sup>[1]</sup> visitors/month
WPRI.COM /	WPRI/WNAC [Providence, RI] Online □ View Release	United States	Broadcast Media	Media & Information	787,926 <sup>[1]</sup> visitors/month

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The Buffalo News, Buffalo, New York	The Buffalo News, Buffalo, New York Online ☐ View Release	United States	Newspaper	Media & Information	766,007 <sup>[1]</sup> visitors/month
NEWS NEWS	WDTN/WBDT [Dayton, OH] Online □ View Release	United States	Broadcast Media	Media & Information	711,490 <sup>[1]</sup> visitors/month
The Times of Northwest ndiana, Munster, ndiana	The Times of Northwest Indiana, Munster, Ind Online  View Release	diana United States	Newspaper	Media & Information	704,475 [1] visitors/month
khon@ WORKING FOR HAWAII	KHON [Honolulu, HI] Online □ View Release	United States	Broadcast Media	Media & Information	643,996 [1 visitors/month
DEW50 WASHINGTON'S CW	WDVM-TV IND-25 [Washington, DC] Online □ View Release	United States	Broadcast Media	Media & Information	609,680 <sup>[1]</sup> visitors/month
KSN:COM LOCAL NEWS:HERE FOR YOU	KSNW [Wichita, KS] Online □ View Release	United States	Broadcast Media	Media & Information	604,897 <sup>[1]</sup> visitors/month
wane com  LOCAL COVERAGE YOU CAN COUNT ON	WANE [Fort Wayne, IN] Online □ View Release	United States	Broadcast Media	Media & Information	595,453 <sup>[1]</sup> visitors/month
<b>Pap</b> homepage	WBRE/WYOU [Wilkes-Barre, PA] Online □ View Release	United States	Broadcast Media	Media & Information	595,400 [1] visitors/month
GreenBay.com	WFRV [Green Bay, WI] Online □ View Release	United States	Broadcast Media	Media & Information	588,841 <sup>[1</sup> visitors/month
ABUFN NOR adds 527	ADVFN Online □ View Release	United States	Financial News Service	Financial	581,314 <sup>[1]</sup> visitors/month
WIVB 4	WIVB [Buffalo, NY] Online □ View Release	United States	Broadcast Media	Media & Information	577,087 <sup>[1]</sup> visitors/month
ROCHESTER FIRST.COM	WROC/WUHF/WZDX [Rochester, NY] Online	United States	Broadcast Media	Media & Information	573,570 <sup>[1</sup> visitors/month
NEWS YOUR LOCAL NEWS LEADER	WTEN/ WXXA-TV [Albany, NY] Online □ View Release	United States	Broadcast Media	Media & Information	533,897 <sup>[1</sup> visitors/month
12 WJTV NEWS FOCUSED ON YOU	WJTV-TV CBS-12 [Jackson, MS] Online □ View Release	United States	Broadcast Media	Media & Information	529,935 [1] visitors/month
ksnt.com WORKING FOR YOU	KSNT-TV NBC-27 [Topeka, KS] Online ☐ View Release	United States	Broadcast Media	Media & Information	516,197 <sup>[1]</sup> visitors/month
Kelo	KELO [Sioux Falls, SD] Online □ View Release	United States	Broadcast Media	Media & Information	515,945 [1 visitors/month
<b>⊯KARK.</b> com	KARK-TV NBC-4 [Little Rock, AR] Online ☐ View Release	United States	Broadcast Media	Media & Information	502,328 <sup>[1]</sup> visitors/month
NEWS 🧖	WHNT [Huntsville, AL] Online ☐ View Release	United States	Broadcast Media	Media & Information	499,355 [1] visitors/month
The Daily Gazette, Schenectady, New York	The Daily Gazette, Schenectady, New York Online  View Release	United States	Newspaper	Media & Information	471,826 <sup>[1]</sup> visitors/month

(	Case 1:23-cv-01967-ER	Document 83-7	Filed 10/1//24	Page 11 of 4	2
<b>OCBS</b> 42	WIAT [Birmingham, AL] Online ☐ View Release	United States	Broadcast Media	Media & Information	462,587 <sup>[1]</sup> visitors/month
channel Wjhl	WJHL-TV/ABC Tri-Cities [Johnson City, TN] Online	United States	Broadcast Media	Media & Information	447,964 <sup>[1]</sup> visitors/month
LOCALSYR.com	WSYR-TV ABC-9 NewsChannel [Syracuse, NY Online ☐ View Release	] United States	Broadcast Media	Media & Information	438,087 <sup>[1]</sup> visitors/month
<b>12</b> WBOY	WBOY [Clarksburg, WV] Online □ View Release	United States	Broadcast Media	Media & Information	420,890 <sup>[1]</sup> visitors/month
<b><b><b><u>⊌</u>KGET</b>.com</b></b>	KGET [Bakersfield, CA] Online ☐ View Release	United States	Broadcast Media	Media & Information	408,123 <sup>[1]</sup> visitors/month
WTRF	WTRF [Wheeling, WV] Online □ View Release	United States	Broadcast Media	Media & Information	406,388 <sup>[1]</sup> visitors/month
NEWS 5	WKRG [Mobile, AL] Online ☐ View Release	United States	Broadcast Media	Media & Information	406,110 <sup>[1]</sup> visitors/month
KTSM.com	KTSM [El Paso, TX] Online ☐ View Release	United States	Broadcast Media	Media & Information	377,752 <sup>[1]</sup> visitors/month
WHO IS	WHO-TV NBC-13 [Des Moines, IA] Online ☐ View Release	United States	Broadcast Media	Media & Information	377,347 <sup>[1]</sup> visitors/month
WIAJ Carrinom	WTAJ [Altoona, PA] Online ☐ View Release	United States	Broadcast Media	Media & Information	354,846 <sup>[1]</sup> visitors/month
News 139 Coverage You Can Count On.	WBTW [Myrtle Beach, SC] Online ☐ View Release	United States	Broadcast Media	Media & Information	353,827 <sup>[1]</sup> visitors/month
UEENCITYNEWS	WJZY-TV FOX-46 [Charlotte, NC] Online ☐ View Release	United States	Broadcast Media	Media & Information	350,046 <sup>[1]</sup> visitors/month
7 NEWS WSPA.COM	WSPA/WYCW [Spartanburg, SC] Online ☐ View Release	United States	Broadcast Media	Media & Information	335,202 <sup>[1]</sup> visitors/month
WDEL 1150 AM DELAWARES REWSHADIO	WDEL-FM 101.7 [Wilmington, DE] Online ☐ View Release	United States	Broadcast Media	Media & Information	329,908 <sup>[1]</sup> visitors/month
WLNS .com	WLNS-TV CBS-6 [Lansing, MI] Online ☐ View Release	United States	Broadcast Media	Media & Information	314,249 <sup>[1]</sup> visitors/month
FOX/NEWS NOW	KXRM [Colorado Springs, CO] Online ☐ View Release	United States	Broadcast Media	Media & Information	313,103 <sup>[1]</sup> visitors/month
mews my <sub>stateline</sub>	WQRF/WTVO [Rockford, IL] Online ☐ View Release	United States	Broadcast Media	Media & Information	301,671 <sup>[1]</sup> visitors/month
WBOC TV 16, Salisbury, Maryland	WBOC TV 16, Salisbury, Maryland Online ☐ View Release	United States	Newspaper	Media & Information	298,776 <sup>[1]</sup> visitors/month
ValleyCentral.com	KVEO-TV CBS-4 [Harlingen, TX] Online	United States	Broadcast Media	Media & Information	278,191 <sup>[1]</sup> visitors/month
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everything Lubbock	KAMC/KLBK Online ☐ View Release	United States	Broadcast Media	Media & Information	270,092 <sup>[1]</sup> visitors/month
KNWA FOX24	KNWA/KFTA [Fayetteville, AR] Online ☐ View Release	United States	Broadcast Media	Media & Information	263,841 <sup>[1]</sup> visitors/month
PANHANDLE COM	WMBB-TV ABC-13 [Panama City, FL] Online □ View Release	United States	Broadcast Media	Media & Information	262,856 <sup>[1]</sup> visitors/month
WNCT SIDE	WNCT [Greenville, NC] Online □ View Release	United States	Broadcast Media	Media & Information	259,227 [1] visitors/month
News 2	WCBD-TV NBC-2 [Charleston, SC] Online □ View Release	United States	Broadcast Media	Media & Information	258,114 <sup>[1]</sup> visitors/month
KLFY.com [6]	KLFY [Lafayette, LA] Online □ View Release	United States	Broadcast Media	Media & Information	257,035 <sup>[1]</sup> visitors/month
CIPROUD	WMBD-TV CBS 31 / WYZZ-TV FOX 43 [Peoria, IL] Online ☐ View Release	United States	Broadcast Media	Media & Information	251,950 <sup>[1]</sup> visitors/month
WCIA .com	WCIA-TV CBS 3 [Champaign, IL] Online □ View Release	United States	Broadcast Media	Media & Information	246,019 [1] visitors/month
NEWS 25 7	WEHT/WTVW [Evansville, IN] Online □ View Release	United States	Broadcast Media	Media & Information	240,192 <sup>[1]</sup> visitors/month
FOX16 <sub>com</sub>	KLRT-TV FOX-16 [Little Rock, AR] Online □ View Release	United States	Broadcast Media	Media & Information	239,657 <sup>[1]</sup> visitors/month
YourErie	WJET-TV ABC-24 / WFXP-TV FOX-44 [Erie, PA] Online ☐ View Release	United States	Broadcast Media	Media & Information	234,736 <sup>[1]</sup> visitors/month
OZAR/(SFIRST.com	KOLR/KOZL [Springfield, MO] Online ☐ View Release	United States	Broadcast Media	Media & Information	225,579 [1] visitors/month
WSAV.com On Your Side	WSAV [Savannah, GA] Online □ View Release	United States	Broadcast Media	Media & Information	224,244 <sup>[1]</sup> visitors/month
The Berkshire Eagle, Pittsfield, Massachusetts	The Berkshire Eagle, Pittsfield, Massachusetts Online ☐ View Release	United States	Newspaper	Media & Information	216,734 <sup>[1]</sup> visitors/month
Channel 6	WJBF [Augusta, GA] Online □ View Release	United States	Broadcast Media	Media & Information	215,384 <sup>[1]</sup> visitors/month
The Citizens' Voice, Wilkes- Barre, Pennsylvania	The Citizens' Voice, Wilkes-Barre, Pennsylvania Online  View Release	United States	Newspaper	Media & Information	215,309 <sup>[1]</sup> visitors/month
your centralvalley.com	KSEE/KGPE [Fresno, CA] Online □ View Release	United States	Broadcast Media	Media & Information	213,602 <sup>[1]</sup> visitors/month
Western Slope Now	KREX/KFQX/KGJT [Grand Junction, CO] Online   ☐ View Release	United States	Broadcast Media	Media & Information	212,160 <sup>[1]</sup> visitors/month
KSN4 homepage 12	KSNF/KODE [Joplin, MO] Online □ View Release	United States	Broadcast Media	Media & Information	204,535 <sup>[1]</sup> visitors/month

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FOX56	WDKY-TV FOX-56 [Lexington, KY] Online	United States	Broadcast Media	Media & Information	202,464 <sup>[1]</sup> visitors/month
The Times- Tribune, Scranton, Pennsylvania	The Times-Tribune, Scranton, Pennsylvania Online  View Release	United States	Newspaper	Media & Information	202,278 <sup>[1]</sup> visitors/month
<b>13</b> NEWS	WOWK-TV CBS-13 [Charleston, WV] Online ☐ View Release	United States	Broadcast Media	Media & Information	196,434 [1] visitors/month
WFXR	WFXR [Roanoke, VA Online ☐ View Release	United States	Broadcast Media	Media & Information	193,143 <sup>[1]</sup> visitors/month
EM39	KIAH [Houston, TX] Online □ View Release	United States	Broadcast Media	Media & Information	192,968 <sup>[1]</sup> visitors/month
OCBS 59	WVNS [Beckley, WV] Online ☐ View Release	United States	Broadcast Media	Media & Information	188,374 <sup>[1]</sup> visitors/month
THE SUN CHRONICLE	The Sun Chronicle [North Attleboro, MA] Online  View Release	United States	Newspaper	Media & Information	187,242 <sup>[1]</sup> visitors/month
Longview News-Journal, Longview, Texas	Longview News-Journal, Longview, Texas Online ☐ View Release	United States	Newspaper	Media & Information	185,895 <sup>[1]</sup> visitors/month
MY I WIN TIERS.COM	WETM-TV NBC-18 [Elmira, NY] Online ☐ View Release	United States	Broadcast Media	Media & Information	185,396 <sup>[1]</sup> visitors/month
Concho Valley	KLST/KSAN [San Angelo, TX] Online □ View Release	United States	Broadcast Media	Media & Information	184,097 [1] visitors/month
The Post-Star, Glens Falls, New York	The Post-Star, Glens Falls, New York Online  View Release	United States	Newspaper	Media & Information	181,871 <sup>[1]</sup> visitors/month
KETKecom	KETK-TV FOX-51 [Tyler, TX] Online □ View Release	United States	Broadcast Media	Media & Information	148,244 <sup>[1]</sup> visitors/month
NEWS NEWS	KXMA/KXMB [Bismark, ND] Online ☐ View Release	United States	Broadcast Media	Media & Information	147,477 <sup>[1]</sup> visitors/month
wrblecom	WRBL [Columbus, GA] Online ☐ View Release	United States	Broadcast Media	Media & Information	146,017 <sup>[1]</sup> visitors/month
WGNO ON NEW ORLEANS' VERY OWN	WGNO [New Orleans, LA] Online ☐ View Release	United States	Broadcast Media	Media & Information	143,757 <sup>[1]</sup> visitors/month
<b>SKTAL</b> news.com	KTAL-TV NBC-6 [Shreveport, LA] Online □ View Release	United States	Broadcast Media	Media & Information	129,326 <sup>[1]</sup> visitors/month
BIG COUNTRY HOMEPHOE FOR	KTAB/KRBC [Abilene, TX] Online □ View Release	United States	Broadcast Media	Media & Information	128,850 <sup>[1]</sup> visitors/month
The Exponent, West Lafayette, Indiana	The Exponent, West Lafayette, Indiana Online ☐ View Release	United States	Newspaper	Media & Information	126,339 <sup>[1]</sup> visitors/month
brproud	WVLA [Baton Rouge, LA] Online □ View Release	United States	Broadcast Media	Media & Information	117,851 <sup>[1]</sup> visitors/month

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Olean Times Herald, Olean, New York	Olean Times Herald, Olean, New York Online ☐ View Release	United States	Newspaper	Media & Information	117,174 <sup>[1</sup> visitors/month
WDHN FOR THE WIREGRASS	WDHN-TV ABC [Webb, AL] Online □ View Release	United States	Broadcast Media	Media & Information	115,747 <sup>[1</sup> visitors/month
Myhighplainseem	Myhighplains Online ☐ View Release	United States	Broadcast Media	Media & Information	115,022 <sup>[1</sup> visitors/month
The Laconia Daily Sun, Laconia, New Hampshire	The Laconia Daily Sun, Laconia, New Hampshire Online ☐ View Release	United States	Newspaper	Media & Information	112,720 <sup>[1</sup> visitors/month
Texomas homepage com	KFDX-TV NBC-3 / KJTL-TV FOX-18 [Wichita Falls, TX] Online □ View Release	United States	Broadcast Media	Media & Information	110,572 <sup>[1</sup> visitors/month
wabash valleycom	WTWO-TV NBC-2/WAWV-TV ABC-38 MyWabashValley [Terre Haute IN] Online □ View Release	United States	Broadcast Media	Media & Information	109,718 <sup>[1</sup> visitors/month
QuadCities	QuadCities WHBF-TV CBS-4 / KLJB-TV FOX-18 [Rock Island, IL] Online  View Release	United States	Broadcast Media	Media & Information	104,235 <sup>[1</sup> visitors/month
Tribune	Albert Lea Tribune [Albert Lea, MN] Online □ View Release	United States	Newspaper	Media & Information	102,700 <sup>[1</sup> visitors/month
Republican Herald, Pottsville, Pennsylvania	Republican Herald, Pottsville, Pennsylvania Online    View Release	United States	Newspaper	Media & Information	101,455 <sup>[]</sup> visitors/montl
YOUR NEWS 04	WTTV [Indianapolis, IN] Online □ View Release	United States	Broadcast Media	Media & Information	98,505 <sup>[]</sup> visitors/mont
FOX 40 WICZ-TV BINGHAMTON	WICZ-TV FOX-40 [Binghamton, NY] Online □ View Release	United States	Broadcast Media	Media & Information	95,304 <sup>[]</sup> visitors/mont
Rome Sentinel, Rome, New York	Rome Sentinel, Rome, New York Online	United States	Newspaper	Media & Information	92,721 <sup>[1</sup> visitors/mont
FOX 44 NEWS.com	KWKT-TV FOX-44 / KYLE-TV MyNetworkTV [Woodway, TX] Online        View Release	United States	Broadcast Media	Media & Information	89,889 <sup>[]</sup> visitors/mont
my <b>arklamiss</b> com	KARD/KTVE [West Monroe, LA] Online □ View Release	United States	Broadcast Media	Media & Information	87,229 <sup>[]</sup> visitors/mont
SIOUXLAND Proud	KCAU-TV ABC-9 Siouxland Proud [Sioux City, IA] Online	United States	Broadcast Media	Media & Information	85,131 <sup>[]</sup> visitors/mont
Queens Chronicle, Queens, New York	Queens Chronicle, Queens, New York Online ☐ View Release	United States	Newspaper	Media & Information	83,215 <sup>[]</sup> visitors/mont
NNY360, Watertown, New York	NNY360, Watertown, New York Online ☐ View Release	United States	Newspaper	Media & Information	77,243 <sup>[]</sup> visitors/mont
The Indiana Gazette, Indiana, Pennsylvania	The Indiana Gazette, Indiana, Pennsylvania Online ☐ View Release	United States	Newspaper	Media & Information	76,993 <sup>[1</sup> visitors/month
Salisburv <b>a</b> Post	Salisbury Post Online  View Release	United States	Newspaper	Media & Information	76,417 <sup>[1</sup> visitors/montl

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The Caledonian- Record, St. Johnsbury, Vermont	The Caledonian-Record, St. Johnsbury, Vermont Online   ☐ View Release	United States	Newspaper	Media & Information	76,142 <sup>[1]</sup> visitors/month
The Hicksburg Post	The Vicksburg Post Online ☐ View Release	United States	Newspaper	Media & Information	74,321 <sup>[1]</sup> visitors/month
Brattleboro Reformer, Brattleboro, Vermont	Brattleboro Reformer, Brattleboro, Vermont Online ☐ View Release	United States	Newspaper	Media & Information	71,937 <sup>[1]</sup> visitors/month
The Citizen, Auburn, New York	The Citizen, Auburn, New York Online ☐ View Release	United States	Newspaper	Media & Information	71,430 <sup>[1]</sup> visitors/month
Finger Lakes Times, Geneva, New York	Finger Lakes Times, Geneva, New York Online  View Release	United States	Newspaper	Media & Information	70,578 <sup>[1]</sup> visitors/month
The Corry Journal, Corry, Pennsylvania	The Corry Journal, Corry, Pennsylvania Online ☐ View Release	United States	Newspaper	Media & Information	69,186 <sup>[1]</sup> visitors/month
NEWS CHANNEL NEBRASKA PANHANOLE	NCN: Panhandle - News Channel Nebraska [Grand Island, NE] Online □ View Release	United States	Broadcast Media	Media & Information	68,852 <sup>[1]</sup> visitors/month
BINGHAMTON homepage	WBGH/WIVT [Binghamton, NY] Online ☐ View Release	United States	Broadcast Media	Media & Information	67,804 <sup>[1]</sup> visitors/month
The Keene Sentinel, Keene, Wyoming	The Keene Sentinel, Keene, Wyoming Online ☐ View Release	United States	Newspaper	Media & Information	67,331 <sup>[1]</sup> visitors/month
Cecil Daily, Elkton, Maryland	Cecil Daily, Elkton, Maryland Online ☐ View Release	United States	Newspaper	Media & Information	66,411 <sup>[1]</sup> visitors/month
Southern Maryland News, Prince Frederick, Maryland	Southern Maryland News, Prince Frederick, Maryland Online  View Release	United States	Newspaper	Media & Information	65,255 <sup>[1]</sup> visitors/month
CW33 good fun	KDAF-TV CW-33 [Dallas, TX] Online ☐ View Release	United States	Broadcast Media	Media & Information	65,039 <sup>[1]</sup> visitors/month
myChamplainValley	WFFF-TV FOX 44 / WVNY-TV ABC-22 [Colchester, VT] Online  View Release	United States	Broadcast Media	Media & Information	64,949 [1] visitors/month
Your Basin	KMID/KPEJ [Odessa, TX] Online □ View Release	United States	Broadcast Media	Media & Information	63,556 <sup>[1]</sup> visitors/month
Times Argus, Barre, Vermont	Times Argus, Barre, Vermont Online	United States	Newspaper	Media & Information	62,365 <sup>[1]</sup> visitors/month
Rutland Herald, Rutland, Vermont	Rutland Herald, Rutland, Vermont Online  View Release	United States	Newspaper	Media & Information	62,242 <sup>[1]</sup> visitors/month
The Daily News Online, Batavia, New York	The Daily News Online, Batavia, New York Online  View Release	United States	Newspaper	Media & Information	60,000 <sup>[1]</sup> visitors/month
The Democrat	Natchez Democrat Online	United States	Newspaper	Media & Information	58,441 <sup>[1]</sup> visitors/month
Daily News	LaGrange Daily News Online ☐ View Release	United States	Newspaper	Media & Information	56,768 <sup>[1]</sup> visitors/month

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The Westerly Sun, Westerly, Rhode Island	The Westerly Sun, Westerly, Rhode Island Online ☐ View Release	United States	Newspaper	Media & Information	54,602 <sup>[1]</sup> visitors/month
The Journal Gazette, Fort Wayne, Indiana	The Journal Gazette, Fort Wayne, Indiana Online ☐ View Release	United States	Newspaper	Media & Information	54,246 <sup>[1]</sup> visitors/month
news	NEWSNet Online  □ View Release	United States	Broadcast Media	Media & Information	50,649 <sup>[1</sup> visitors/month
Times Bulletin, Van Wert, Ohio	Times Bulletin, Van Wert, Ohio Online ☐ View Release	United States	Newspaper	Media & Information	50,403 [1 visitors/month
The Sentinel, Carlisle, Pennsylvania	The Sentinel, Carlisle, Pennsylvania Online  View Release	United States	Newspaper	Media & Information	50,172 <sup>[1</sup> visitors/month
magnoliastatel <mark>ive</mark> NISSISSIPPUS NEWS SOVACE	Magnolia State Live Online ☐ View Release	United States	Newspaper	Media & Information	49,450 <sup>[1</sup> visitors/month
The Courier- Express, DuBois, Pennsylvania	The Courier-Express, DuBois, Pennsylvania Online ☐ View Release	United States	Newspaper	Media & Information	47,284 <sup>[1]</sup> visitors/month
The Courier- Express, DuBois, Pennsylvania	The Courier-Express, DuBois, Pennsylvania Online   ☐ View Release	United States	Newspaper	Media & Information	47,284 <sup>[1</sup> visitors/month
The Progress News, Clearfield, Pennsylvania	The Progress News, Clearfield, Pennsylvania Online ☐ View Release	United States	Newspaper	Media & Information	47,196 <sup>[1</sup> visitors/month
The Conway Daily Sun, North Conway, New Hampshire	The Conway Daily Sun, North Conway, New H Online	ampshire United States	Newspaper	Media & Information	46,510 <sup>[1]</sup> visitors/month
One News Page	One News Page Online □ View Release	Hong Kong	Information Website	General	45,703 [1 visitors/month
Herald	Austin Daily Herald Online	United States	Newspaper	Media & Information	44,697 <sup>[1</sup> visitors/month
The News =	Port Arthur News Online  View Release	United States	Newspaper	Media & Information	44,688 [1 visitors/month
Gettysburg Times, Gettysburg, Pennsylvania	Gettysburg Times, Gettysburg, Pennsylvania Online ☐ View Release	United States	Newspaper	Media & Information	44,098 <sup>[1</sup> visitors/month
Bennington Banner, Bennington, Vermont	Bennington Banner, Bennington, Vermont Online ☐ View Release	United States	Newspaper	Media & Information	43,172 <sup>[1</sup> visitors/month
THE OXFORD EACLE	The Oxford Eagle Online  □ View Release	United States	Newspaper	Media & Information	43,012 <sup>[1</sup> visitors/month
SHELBY COUNTY REPORTER Admin the common tempor	Shelby County Reporter Online  View Release	United States	Newspaper	Media & Information	42,651 <sup>[1</sup> visitors/month
DAILY NEWS	Washington Daily News Online ☐ View Release	United States	Newspaper	Media & Information	42,418 <sup>[1</sup> visitors/month
	WWTI-TV ABC-50 [Watertown, NY]	United	Broadcast Media	Media & Information	40,557 [1

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<b>Vizit</b> erson	WJMN-TV CBS 3 [Escanaba, WI] Online ☐ View Release	United States	Broadcast Media	Media & Information	40,554 <sup>[1]</sup> visitors/month
NEWS CHANNEL NEBRASKA	NCN: Northeast - News Channel Nebraska [Norf Online  View Release	olk, NE] United States	Broadcast Media	Media & Information	39,184 [1] visitors/month
Hudson Valley 360, Hudson Valley, New York	Hudson Valley 360, Hudson Valley, New York Online ☐ View Release	United States	Newspaper	Media & Information	38,986 <sup>[1]</sup> visitors/month
NEWS CHANNEL NEBRASKA SOUTHEAST NEBRASKA	NCN: Southeast - News Channel Nebraska [Bea Online  View Release	trice, NE] United States	Broadcast Media	Media & Information	38,729 <sup>[1]</sup> visitors/month
.eaderPublications	Leader Publications Online ☐ View Release	United States	Newspaper	Media & Information	38,712 <sup>[1]</sup> visitors/month
Suffolk News Herald	The Suffolk News-Herald Online ☐ View Release	United States	Newspaper	Media & Information	37,147 <sup>[1]</sup> visitors/month
Lake County News, Lake County, California	Lake County News, Lake County, California Online  View Release	United States	Newspaper	Media & Information	36,594 <sup>[1]</sup> visitors/month
NEWS CHANNEL NEBRASKA	NCN: River Country - NewsChannelNebraska [N City, NE] Online    View Release	ebraska United States	Broadcast Media	Media & Information	35,850 <sup>[1]</sup> visitors/month
Standard- Speaker, Hazleton, Pennsylvania	Standard-Speaker, Hazleton, Pennsylvania Online  View Release	United States	Newspaper	Media & Information	35,339 <sup>[1]</sup> visitors/month
The Bradford Era, Bradford, Pennsylvania	The Bradford Era, Bradford, Pennsylvania Online ☐ View Release	United States	Newspaper	Media & Information	35,309 <sup>[1]</sup> visitors/month
Grants Pass Daily Courier, Grants Pass, Oregon	Grants Pass Daily Courier, Grants Pass, Oregon Online ☐ View Release	United States	Newspaper	Media & Information	34,964 <sup>[1]</sup> visitors/month
WKBN 27	WYTV-TV ABC-33 [Youngstown, OH] Online □ View Release	United States	Broadcast Media	Media & Information	34,370 <sup>[1]</sup> visitors/month
roymessenger.com	The Troy Messenger Online ☐ View Release	United States	Newspaper	Media & Information	32,734 <sup>[1]</sup> visitors/month
Fioga Publishing, Wellsboro, Pennsylvania	Tioga Publishing, Wellsboro, Pennsylvania Online ☐ View Release	United States	Newspaper	Media & Information	32,277 <sup>[1]</sup> visitors/month
NEWS CHANNEL NEBRASKA PLATTE VALLES	NCN: Platte Valley - News Channel Nebraska [C NE] Online  View Release	olumbus, United States	Broadcast Media	Media & Information	31,783 <sup>[1]</sup> visitors/month
Tibune,com	Ironton Tribune Online □ View Release	United States	Newspaper	Media & Information	30,067 <sup>[1]</sup> visitors/month
The Madison Courier, Madison, ndiana	The Madison Courier, Madison, Indiana Online  View Release	United States	Newspaper	Media & Information	29,912 <sup>[1]</sup> visitors/month
Tha Minchaetar Sun	Winchester Sun Online  □ View Release	United States	Newspaper	Media & Information	29,604 <sup>[1]</sup> visitors/month

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Leader Times, Kittanning, Pennsylvania	Leader Times, Kittanning, Pennsylvania Online ☐ View Release	United States	Newspaper	Media & Information	29,085 <sup>[1]</sup> visitors/month
The New Britain Herald, New Britain, Connecticut	The New Britain Herald, New Britain, Connect Online  View Release	United States	Newspaper	Media & Information	28,426 <sup>[1]</sup> visitors/month
Elizabethton Star	Elizabethton Star Online	United States	Newspaper	Media & Information	27,712 <sup>[1]</sup> visitors/month
St. Albans Messenger, St. Albans, Vermont	St. Albans Messenger, St. Albans, Vermont Online ☐ View Release	United States	Newspaper	Media & Information	27,638 <sup>[1]</sup> visitors/month
DAILY LEADER	Daily Leader Online ☐ View Release	United States	Newspaper	Media & Information	27,628 <sup>[1]</sup> visitors/month
ÂTHE COASTLAND TIMES	The Coastland Times Online □ View Release	United States	Newspaper	Media & Information	27,348 <sup>[1]</sup> visitors/month
CNY homepage.com	CNYhomepage Online	United States	Broadcast Media	Media & Information	27,334 <sup>[1]</sup> visitors/month
The Parmville Herald	The Farmville Herald Online ☐ View Release	United States	Newspaper	Media & Information	26,340 <sup>[1]</sup> visitors/month
Latrobe Bulletin News, Latrobe, Pennsylvania	Latrobe Bulletin News, Latrobe, Pennsylvania Online ☐ View Release	United States	Newspaper	Media & Information	26,329 <sup>[1]</sup> visitors/month
American Press	American Press Online ☐ View Release	United States	Newspaper	Media & Information	25,797 <sup>[1]</sup> visitors/month
News-Herald.com	The Roanoke Chowan News Herald Online ☐ View Release	United States	Newspaper	Media & Information	24,905 <sup>[1]</sup> visitors/month
Outlook	Alexander City Outlook Online ☐ View Release	United States	Newspaper	Media & Information	24,737 <sup>[1]</sup> visitors/month
OBSERVATEUR	L'Observateur Online ☐ View Release	United States	Newspaper	Media & Information	23,815 <sup>[1]</sup> visitors/month
The Bristol Press, Bristol, Connecticut	The Bristol Press, Bristol, Connecticut Online	United States	Newspaper	Media & Information	23,677 <sup>[1]</sup> visitors/month
Coastal Point, Ocean View, Delaware	Coastal Point, Ocean View, Delaware Online ☐ View Release	United States	Newspaper	Media & Information	22,299 <sup>[1]</sup> visitors/month
State Journal	The State Journal Online	United States	Newspaper	Media & Information	22,214 <sup>[1]</sup> visitors/month
Star-News	The Andalusia Star-News Online ☐ View Release	United States	Newspaper	Media & Information	21,829 <sup>[1]</sup> visitors/month
PHL17	WPHL [Philadelphia, PA] Online □ View Release	United States	Broadcast Media	Media & Information	21,730 <sup>[1]</sup> visitors/month
The Manchester Journal, Manchester, Vermont	The Manchester Journal, Manchester, Vermon Online	ut United States	Newspaper	Media & Information	20,786 <sup>[1]</sup> visitors/month

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Salamanca Press, Salamanca, New York	Salamanca Press, Salamanca, New York Online ☐ View Release	United States	Newspaper	Media & Information	20,669 <sup>[1]</sup> visitors/month
THE WETUMPKA HERALD	The Wetumpka Herald Online ☐ View Release	United States	Newspaper	Media & Information	20,271 <sup>[1]</sup> visitors/month
Picayune Item	Picayune Item Online ☐ View Release	United States	Newspaper	Media & Information	19,962 <sup>[1]</sup> visitors/month
Buffalo Spree Magazine, Buffalo, New York	Buffalo Spree Magazine, Buffalo, New York Online  View Release	United States	Newspaper	Media & Information	19,887 <sup>[1]</sup> visitors/month
Ocean City Today, Ocean City, Maryland	Ocean City Today, Ocean City, Maryland Online View Release	United States	Newspaper	Media & Information	19,866 <sup>[1]</sup> visitors/month
The Eagle- Times, Claremont, New Hampshire	The Eagle-Times, Claremont, New Hampshire Online  View Release	United States	Newspaper	Media & Information	19,344 <sup>[1]</sup> visitors/month
The Bryan Times, Bryan, Ohio	The Bryan Times, Bryan, Ohio Online ☐ View Release	United States	Newspaper	Media & Information	18,778 <sup>[1]</sup> visitors/month
SMITHFIELD TIMES	Smithfield Times Online ☐ View Release	United States	Newspaper	Media & Information	18,552 <sup>[1]</sup> visitors/month
The Daily Review, Towanda, Pennsylvania	The Daily Review, Towanda, Pennsylvania Online  View Release	United States	Newspaper	Media & Information	18,243 <sup>[1]</sup> visitors/month
The Daily News, Huntingdon, Pennsylvania	The Daily News, Huntingdon, Pennsylvania Online ☐ View Release	United States	Newspaper	Media & Information	17,333 <sup>[1]</sup> visitors/month
NEWS CHANNEL NEBRASKA	NCN: Metro - News Channel Nebraska [Omaha, NE] Online ☐ View Release	United States	Broadcast Media	Media & Information	16,908 <sup>[1]</sup> visitors/month
The Times-Yews	Valley Times-News Online ☐ View Release	United States	Newspaper	Media & Information	15,766 [1] visitors/month
Tryon Daily Bulletin	The Tryon Daily Bulletin Online ☐ View Release	United States	Newspaper	Media & Information	15,732 <sup>[1]</sup> visitors/month
The News- Item, Shamokin, Pennsylvania	The News-Item, Shamokin, Pennsylvania Online ☐ View Release	United States	Newspaper	Media & Information	15,606 <sup>[1]</sup> visitors/month
LEADER	Orange Leader Online	United States	Newspaper	Media & Information	14,811 <sup>[1]</sup> visitors/month
The Daily News	The Bogalusa Daily News Online ☐ View Release	United States	Newspaper	Media & Information	14,593 <sup>[1]</sup> visitors/month
NewsBlaze	NewsBlaze US Online ☐ View Release	United States	Online News Sites & Other Influencers	Media & Information	14,587 <sup>[1]</sup> visitors/month
Oswego County News Now, Oswego County, New York	Oswego County News Now, Oswego County, New York Online View Release	United States	Newspaper	Media & Information	14,476 <sup>[1]</sup> visitors/month

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Prime Publishers, Waterbury, Connecticut	Prime Publishers, Waterbury, Connecticut Online ☐ View Release	United States	Newspaper	Media & Information	13,640 <sup>[1]</sup> visitors/month
The Greenville Advocate	The Greenville Advocate Online □ View Release	United States	Newspaper	Media & Information	13,616 <sup>[1]</sup> visitors/month
The Chronicle, Centralia, Washington	The Chronicle, Centralia, Washington Online ☐ View Release	United States	Newspaper	Media & Information	13,032 <sup>[1]</sup> visitors/month
The Advocate-Messenger	The Advocate-Messenger Online □ View Release	United States	Newspaper	Media & Information	12,907 <sup>[1]</sup> visitors/month
WI Proud	WLAX-TV FOX 28/45 [La Crosse, WI] Online □ View Release	United States	Broadcast Media	Media & Information	12,826 <sup>[1]</sup> visitors/month
Winchester News Gazette, Winchester, Indiana	Winchester News Gazette, Winchester, Indiana Online ☐ View Release	United States	Newspaper	Media & Information	12,562 <sup>[1]</sup> visitors/month
The Record- Argus, Greenville, Pennsylvania	The Record-Argus, Greenville, Pennsylvania Online ☐ View Release	United States	Newspaper	Media & Information	11,436 <sup>[1]</sup> visitors/month
The Host Searchlight	The Post-Searchlight Online ☐ View Release	United States	Newspaper	Media & Information	11,179 <sup>[1]</sup> visitors/month
The Sentinel, Lewistown, Pennsylvania	The Sentinel, Lewistown, Pennsylvania Online ☐ View Release	United States	Newspaper	Media & Information	11,152 <sup>[1]</sup> visitors/month
Morning Times, Sayre, Pennsylvania	Morning Times, Sayre, Pennsylvania Online ☐ View Release	United States	Newspaper	Media & Information	10,508 <sup>[1]</sup> visitors/month
THE JESSAMINE JOURNAL	Jessamine Journal Online □ View Release	United States	Newspaper	Media & Information	10,261 <sup>[1]</sup> visitors/month
The Essex Reporter, Essex, Vermont	The Essex Reporter, Essex, Vermont Online ☐ View Release	United States	Newspaper	Media & Information	10,093 <sup>[1]</sup> visitors/month
The Stanly News @ Press	The Stanly News & Press Online ☐ View Release	United States	Newspaper	Media & Information	10,040 <sup>[1]</sup> visitors/month
The Punxsutawney Spirit, Punxsutawney, Pennsylvania	The Punxsutawney Spirit, Punxsutawney, Pennsylvania Online  View Release	United States	Newspaper	Media & Information	10,002 <sup>[1]</sup> visitors/month
Decatur Daily Democrat, Decatur, Indiana	Decatur Daily Democrat, Decatur, Indiana Online ☐ View Release	United States	Newspaper	Media & Information	9,875 <sup>[1]</sup> visitors/month
Chagrin Valley Today, Chagrin Falls, Ohio	Chagrin Valley Today, Chagrin Falls, Ohio Online ☐ View Release	United States	Newspaper	Media & Information	9,850 [1] visitors/month
Malone Telegram, Malone, New York	Malone Telegram, Malone, New York Online ☐ View Release	United States	Newspaper	Media & Information	9,472 [1] visitors/month
Rock 107, Scranton, Pennsylvania	Rock 107, Scranton, Pennsylvania Online ☐ View Release	United States	Newspaper	Media & Information	8,671 <sup>[1]</sup> visitors/month

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ALABAMA NOW	Alabama Now Online ☐ View Release	United States	Newspaper	Media & Information	8,444 <sup>[1]</sup> visitors/month
The Progress Newspaper, Archbold, Ohio	The Progress Newspaper, Archbold, Ohio Online ☐ View Release	United States	Newspaper	Media & Information	8,125 <sup>[1]</sup> visitors/month
The Pilot News, Plymouth, Indiana	The Pilot News, Plymouth, Indiana Online	United States	Newspaper	Media & Information	8,090 <sup>[1]</sup> visitors/month
Rhode Island Central, Rhode Island	Rhode Island Central, Rhode Island Online  View Release	United States	Newspaper	Media & Information	8,038 <sup>[1]</sup> visitors/month
The Charlotte Gazette	The Charlotte Gazette Online	United States	Newspaper	Media & Information	7,885 <sup>[1]</sup> visitors/month
The Colchester Gun, Colchester, Vermont	The Colchester Sun, Colchester, Vermont Online ☐ View Release	United States	Newspaper	Media & Information	7,870 <sup>[1]</sup> visitors/month
he Voonsocket Call, Voonsocket, Rhode Island	The Woonsocket Call, Woonsocket, Rhode Isl Online  View Release	land United States	Newspaper	Media & Information	7,861 <sup>[1]</sup> visitors/month
lorthwest iignal, lapoleon, Dhio	Northwest Signal, Napoleon, Ohio Online ☐ View Release	United States	Newspaper	Media & Information	7,725 <sup>[1]</sup> visitors/month
Apparel Search	Apparel Search Online ☐ View Release	United States	Online News Sites & Other Influencers	Retail & Consumer	7,666 <sup>[1]</sup> visitors/month
Advertiser	The Clanton Advertiser Online □ View Release	United States	Newspaper	Media & Information	7,551 <sup>[1]</sup> visitors/month
The St. Marys Daily Press, St. Marys, Pennsylvania	The St. Marys Daily Press, St. Marys, Pennsyl Online  View Release	Ivania United States	Newspaper	Media & Information	7,267 <sup>[1]</sup> visitors/month
DEMOPOLIS JIMES	The Demopolis Times Online □ View Release	United States	Newspaper	Media & Information	7,123 <sup>[1]</sup> visitors/month
LAIBORNE PROGRESS	Claiborne Progress Online	United States	Newspaper	Media & Information	7,057 <sup>[1]</sup> visitors/month
The Record- Review, Clinton, Ilinois	The Record-Review, Clinton, Illinois Online ☐ View Release	United States	Newspaper	Media & Information	6,702 <sup>[1]</sup> visitors/month
Vapakoneta Daily News, Vapakoneta, Dhio	Wapakoneta Daily News, Wapakoneta, Ohio Online ☐ View Release	United States	Newspaper	Media & Information	6,668 <sup>[1]</sup> visitors/month
The Tidewater News	The Tidewater News Online ☐ View Release	United States	Newspaper	Media & Information	6,654 <sup>[1]</sup> visitors/month
Newport Daily Express, Newport, Vermont	Newport Daily Express, Newport, Vermont Online ☐ View Release	United States	Newspaper	Media & Information	6,473 <sup>[1]</sup> visitors/month
Selma Times-Tournal	The Selma Times-Journal Online	United States	Newspaper	Media & Information	6,382 [1] visitors/month

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Arundel News, Arundel, Maryland	Arundel News, Arundel, Maryland Online ☐ View Release	United States	Newspaper	Media & Information	6,328 <sup>[1]</sup> visitors/month
whatsOn'	WhatsOn Online ☐ View Release	Global	Online News Sites & Other Influencers	Entertainment	6,289 <sup>[1]</sup> visitors/month
DAVIE COUNTY ENTERPRISE RECORD	Davie County Enterprise Record Online ☐ View Release	United States	Newspaper	Media & Information	5,945 <sup>[1]</sup> visitors/month
SDG Newspapers, Swanton, Ohio	SDG Newspapers, Swanton, Ohio Online ☐ View Release	United States	Newspaper	Media & Information	5,780 <sup>[1]</sup> visitors/month
Putnam County Sentinel, Ottawa, Ohio	Putnam County Sentinel, Ottawa, Ohio Online ☐ View Release	United States	Newspaper	Media & Information	5,701 <sup>[1]</sup> visitors/month
Middlesboro News	Middlesboro News Online ☐ View Release	United States	Newspaper	Media & Information	5,515 <sup>[1]</sup> visitors/month
Toledo Legal News, Toledo, Ohio	Toledo Legal News, Toledo, Ohio Online ☐ View Release	United States	Newspaper	Media & Information	5,416 <sup>[1]</sup> visitors/month
news	Northern Michigan NEWSNet Online □ View Release	United States	Broadcast Media	Media & Information	5,349 <sup>[1]</sup> visitors/month
brewtonstandard.com East Escarbia County's order news source	The Brewton Standard Online □ View Release	United States	Newspaper	Media & Information	5,076 <sup>[1]</sup> visitors/month
The@Panolian	The Panolian Online □ View Release	United States	Newspaper	Media & Information	4,484 <sup>[1]</sup> visitors/month
Block Island Times, Block Island, Rhode Island	Block Island Times, Block Island, Rhode Island Online ☐ View Release	United States	Newspaper	Media & Information	4,434 [1] visitors/month
Atmore Advance	The Atmore Advance Online    View Release	United States	Newspaper	Media & Information	4,302 <sup>[1]</sup> visitors/month
CenLANow	WNTZ [Alexandria, LA] Online □ View Release	United States	Broadcast Media	Media & Information	4,273 <sup>[1]</sup> visitors/month
	NEWSnet Detroit Online   ☐ View Release	United States	Broadcast Media	Media & Information	4,238 <sup>[1]</sup> visitors/month
The Penn, Pittsburgh, Pennsylvania	The Penn, Pittsburgh, Pennsylvania Online ☐ View Release	United States	Newspaper	Media & Information	4,225 <sup>[1]</sup> visitors/month
Ship Inc., Ocean City, Maryland	Ship Inc., Ocean City, Maryland Online ☐ View Release	United States	Newspaper	Media & Information	4,165 <sup>[1]</sup> visitors/month
Americus Times-Recorder	Americus Times-Recorder Online ☐ View Release	United States	Newspaper	Media & Information	4,155 <sup>[1]</sup> visitors/month
YOUR BIGSKY COM	KHMT/KSVI [Billings, MT] Online □ View Release	United States	Broadcast Media	Media & Information	3,780 <sup>[1]</sup> visitors/month
The Post & Mail, Columbia City, Indiana	The Post & Mail, Columbia City, Indiana Online ☐ View Release	United States	Newspaper	Media & Information	3,622 [1] visitors/month
Delphos Herald, Delphos, Ohio	Delphos Herald, Delphos, Ohio Online ☐ View Release	United States	Newspaper	Media & Information	3,614 [1] visitors/month

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THE Q MARKETON DISPATCH	Kenbridge Victoria Dispatch Online ☐ View Release	United States	Newspaper	Media & Information	3,556 <sup>[1]</sup> visitors/month
The Clarion News, Clarion, Pennsylvania	The Clarion News, Clarion, Pennsylvania Online ☐ View Release	United States	Newspaper	Media & Information	3,483 <sup>[1]</sup> visitors/month
Courier	The Clemmons Courier Online ☐ View Release	United States	Newspaper	Media & Information	3,335 [1] visitors/month
ATIN! BIZ‡	Latin Business Today Online ☐ View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	3,315 <sup>[1</sup> visitors/month
Delmarva Sports Network, Salisbury, Maryland	Delmarva Sports Network, Salisbury, Maryland Online ☐ View Release	United States	Newspaper	Media & Information	3,274 [1] visitors/month
Villiston Observer, Villiston, Vermont	Williston Observer, Williston, Vermont Online ☐ View Release	United States	Newspaper	Media & Information	3,212 <sup>[1</sup> visitors/month
INTERIOR JOURNAL	The Interior Journal Online □ View Release	United States	Newspaper	Media & Information	3,156 <sup>[1</sup> visitors/month
Sportsnews HIGHLIGHTS	NEWSNet Sports Online ☐ View Release	United States	Online News Sites & Other Influencers	Media & Information	3,061 <sup>[1]</sup> visitors/month
WINDSORWeekly	Windsor Weekly Online ☐ View Release	United States	Newspaper	Media & Information	3,007 [1 visitors/month
STON MATCH CHEST STUMBON STON MATCH CHEST ST	KJUN-TV / KFOL-TV HTV10 [Houma, LA] Online □ View Release	United States	Broadcast Media	Media & Information	2,954 <sup>[1]</sup> visitors/month
Medina County Life, Medina, Ohio	Medina County Life, Medina, Ohio Online ☐ View Release	United States	Newspaper	Media & Information	2,853 <sup>[1</sup> visitors/month
Dundalk Eagle, Dundalk, Maryland	Dundalk Eagle, Dundalk, Maryland Online ☐ View Release	United States	Newspaper	Media & Information	2,764 <sup>[1]</sup> visitors/month
Kane County Chronicle, St. Charles, Ilinois	Kane County Chronicle, St. Charles, Illinois Online ☐ View Release	United States	Newspaper	Media & Information	2,520 <sup>[1</sup> visitors/month
Wyoming County Examiner, Tunkhannock, Pennsylvania	Wyoming County Examiner, Tunkhannock, Pennsylvania Online  View Release	United States	Newspaper	Media & Information	2,406 <sup>[1]</sup> visitors/month
CORDELE DISPATCH	Cordele Dispatch Online □ View Release	United States	Newspaper	Media & Information	2,317 <sup>[1</sup> visitors/month
Massachusetts Nonprofit Network, Boston, Massachusetts	Massachusetts Nonprofit Network, Boston, Massachusetts Online ☐ View Release	United States	Newspaper	Media & Information	2,213 <sup>[1]</sup> visitors/month
The Milton Times, Milton, Massachusetts	The Milton Times, Milton, Massachusetts Online ☐ View Release	United States	Newspaper	Media & Information	2,101 <sup>[1</sup> visitors/month
The Tallassee Tribune	The Tallassee Tribune Online □ View Release	United States	Newspaper	Media & Information	1,991 <sup>[1</sup> visitors/month
Gates County Index	Gates County Index Online  View Release	United States	Newspaper	Media & Information	1,979 <sup>[1</sup> visitors/month

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<b>LEESVILLE</b> DAILY LEADER	Leesville Leader Online ☐ View Release	United States	Newspaper	Media & Information	1,783 <sup>[1]</sup> visitors/month
TIMES of SAN DIEGO	Times of San Diego Online ☐ View Release	United States	Newspaper	Media & Information	1,676 <sup>[1]</sup> visitors/month
WestLife News, Westlake, Ohio	WestLife News, Westlake, Ohio Online ☐ View Release	United States	Newspaper	Media & Information	1,530 <sup>[1]</sup> visitors/month
Harlan Enterprise	Harlan Enterprise Online ☐ View Release	United States	Newspaper	Media & Information	1,524 <sup>[1]</sup> visitors/month
The Ada Herald	Ada Herald [Ada, OH] Online □ View Release	United States	Newspaper	Media & Information	1,382 <sup>[1]</sup> visitors/month
The Arentiss Headlight	Prentiss Headlight Online ☐ View Release	United States	Newspaper	Media & Information	1,318 <sup>[1]</sup> visitors/month
kLOWNDES A Signal	Lowndes Signal Online ☐ View Release	United States	Newspaper	Media & Information	1,274 <sup>[1]</sup> visitors/month
Sangri Times	Sangri Times Online ☐ View Release	India	Online News Sites & Other Influencers	General	1,185 <sup>[1]</sup> visitors/month
Sullivan Daily Fimes, Sullivan, Indiana	Sullivan Daily Times, Sullivan, Indiana Online ☐ View Release	United States	Newspaper	Media & Information	1,171 <sup>[1]</sup> visitors/month
Hemet Valley/Idyllwild Pilot, Hemet, California	Hemet Valley/Idyllwild Pilot, Hemet, Californ Online ☐ View Release	ia United States	Newspaper	Media & Information	1,098 <sup>[1]</sup> visitors/month
The Ohio Press Network, Ohio	The Ohio Press Network, Ohio Online ☐ View Release	United States	Newspaper	Media & Information	1,078 <sup>[1]</sup> visitors/month
<b>bluegrass</b> live	Bluegrass Live Online ☐ View Release	United States	Newspaper	Media & Information	1,069 <sup>[1]</sup> visitors/month
Support for Stepdads to support for Stepdads	Support for Stepdads Online ☐ View Release	United States	Blog-Parental Influencers	Retail & Consumer	1,055 <sup>[1]</sup> visitors/month
Hartford City News Times, Hartford City, Indiana	Hartford City News Times, Hartford City, Ind Online ☐ View Release	iana United States	Newspaper	Media & Information	1,044 <sup>[1]</sup> visitors/month
Minster Community Post, Minster, Ohio	Minster Community Post, Minster, Ohio Online ☐ View Release	United States	Newspaper	Media & Information	1,042 <sup>[1]</sup> visitors/month
WNC BUSINESS Consect - Intern - Insper	WNC Business Online ☐ View Release	United States	Newspaper	Media & Information	1,019 <sup>[1]</sup> visitors/month
Ridgway Record, Ridgway, Pennsylvania	Ridgway Record, Ridgway, Pennsylvania Online View Release	United States	Newspaper	Media & Information	1,012 <sup>[1]</sup> visitors/month
ChineseWire	ChineseWire Online	United States	Online News Sites & Other Influencers	Media & Information	1,004 <sup>[1]</sup> visitors/month
Ashland	Ashland Town News Online ☐ View Release	United States	Newspaper	Media & Information	986 [1] visitors/month

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Journal	Luverne Journal Online ☐ View Release	United States	Newspaper	Media & Information	964 <sup>[1]</sup> visitors/month
Journals	Holladay Journal Online ☐ View Release	United States	Newspaper	Media & Information	911 <sup>[1]</sup> visitors/month
Biz570, Pennsylvania	Biz570, Pennsylvania Online ☐ View Release	United States	Newspaper	Media & Information	818 <sup>[1]</sup> visitors/month
Fayetteville Connect	Fayetteville Connect Online ☐ View Release	United States	Newspaper	Media & Information	810 <sup>[1]</sup> visitors/month
walnutcreek	Walnut Creek Magazine Online ☐ View Release	United States	Newspaper	Media & Information	805 <sup>[1]</sup> visitors/month
Journals	West Jordan Journal Online □ View Release	United States	Newspaper	Media & Information	796 <sup>[1]</sup> visitors/month
GULF&MAIN Fort Myers & Neighboring Communities	Gulf & Main Magazine Online □ View Release	United States	Newspaper	Media & Information	785 <sup>[1]</sup> visitors/month
THE CHILLICO THE HOMETOWN VICE	The Chillicothe Hometown Voice Online ☐ View Release	United States	Newspaper	Media & Information	775 <sup>[1]</sup> visitors/month
Journals NOTH COLORS CONNECTED STATES	South Jordan Journal Online ☐ View Release	United States	Newspaper	Media & Information	766 <sup>[1]</sup> visitors/month
RSWLIVING Regional Southwest Florida Communities	RSW Living Magazine [Sanibel, FL] Online  View Release	United States	Newspaper	Media & Information	765 <sup>[1]</sup> visitors/month
Shoals News, Florence AL	Shoals News, Florence AL Online  View Release	United States	Newspaper	Media & Information	754 <sup>[1]</sup> visitors/month
CITYPAPER MEMBER SUPPORTED	Washington City Paper [Washington, DC] Online □ View Release	United States	Newspaper	General	751 <sup>[1]</sup> visitors/month
Chester PRESS	Chester County Press Online ☐ View Release	United States	Newspaper	Media & Information	692 <sup>[1]</sup> visitors/month
Journals OUR A SOURCE OF COMMONT SEPARATE	Sugar House Journal Online ☐ View Release	United States	Newspaper	Media & Information	675 <sup>[1]</sup> visitors/month
North East News Journal, North East, Pennsylvania	North East News Journal, North East, Pennsyl Online ☐ View Release	vania United States	Newspaper	Media & Information	673 <sup>[1]</sup> visitors/month
CossètMôi	Cosset Moi Online □ View Release	United States	Online News Sites & Other Influencers	Retail & Consumer	662 [1] visitors/month
John Davis 1	Davis Journal Online □ View Release	United States	Newspaper	Media & Information	662 <sup>[1]</sup> visitors/month
Journals WINDS CONTINUE STREET, STREET	Midvale Journal Online □ View Release	United States	Newspaper	Media & Information	656 <sup>[1]</sup> visitors/month
Columbia Monthly	Columbia Business Monthly Online  View Release	United States	Newspaper	Media & Information	650 <sup>[1]</sup> visitors/month
99.5 Janz	99.5 JAMZ [Weldon, NC] Online ☐ View Release	United States	Broadcast Media	Media & Information	643 [1] visitors/month
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Journals	Sandy Journal Online □ View Release	United States	Newspaper	Media & Information	640 <sup>[1]</sup> visitors/month
Norfolk & Wrentham	Norfolk & Wrentham News Online ☐ View Release	United States	Newspaper	Media & Information	640 [1] visitors/month
BRIDGE HMEDIA Inetworks	Bridge Media Networks Online ☐ View Release	United States	Broadcast Media	Media & Information	635 <sup>[1]</sup> visitors/month
BEAUREGARD NEWS	Beauregard News Online ☐ View Release	United States	Newspaper	Media & Information	605 <sup>[1]</sup> visitors/month
wzvc 15	NEWSnet Atlanta Online ☐ View Release	United States	Broadcast Media	Media & Information	599 [1] visitors/month
Medway & Millis	Medway & Millis News Online ☐ View Release	United States	Newspaper	Media & Information	593 [1] visitors/month
Journals OUTBOARD OF CONTROL OF STREET	Cottonwood Heights Journal Online  View Release	United States	Newspaper	Media & Information	572 <sup>[1]</sup> visitors/month
GOUNTER C	KLXS-FM 95.3 Online ☐ View Release	United States	Broadcast Media	Media & Information	558 [1] visitors/month
MBNEWS	MB News Online □ View Release	United States	Newspaper	Media & Information	551 <sup>[1]</sup> visitors/month
Natick	Natick Town News Online	United States	Newspaper	Media & Information	543 [1] visitors/month
Hopedale	Hopedale Town News Online ☐ View Release	United States	Newspaper	Media & Information	538 <sup>[1]</sup> visitors/month
EARL 98.3 Furtherest Area Could that of the fair large for	WDLZ 98.3-FM [Murfreesboro, NC] Online ☐ View Release	United States	Broadcast Media	Media & Information	538 <sup>[1]</sup> visitors/month
Journals	Herriman Journal Online □ View Release	United States	Newspaper	Media & Information	526 <sup>[1]</sup> visitors/month
Connect	Connect Iredell Online ☐ View Release	United States	Newspaper	Media & Information	521 <sup>[1]</sup> visitors/month
	NEWSnet Columbus Online ☐ View Release	United States	Broadcast Media	Media & Information	516 <sup>[1]</sup> visitors/month
Stoti.com Your Source for SWFL	Toti.com Online ☐ View Release	United States	Newspaper	Media & Information	514 <sup>[1]</sup> visitors/month
	NEWSnet Augusta Online ☐ View Release	United States	Broadcast Media	Media & Information	508 <sup>[1]</sup> visitors/month
CHAIP	KKYA-FM 93.1 Online ☐ View Release	United States	Broadcast Media	Media & Information	495 [1] visitors/month
Journals	West Valley City Journal Online □ View Release	United States	Newspaper	Media & Information	493 [1] visitors/month

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Franklin	Franklin Town News Online ☐ View Release	United States	Newspaper	Media & Information	492 <sup>[1]</sup> visitors/month
Journals	South Salt Lake Journal Online ☐ View Release	United States	Newspaper	Media & Information	477 <sup>[1]</sup> visitors/month
Journals Journals	City Journals Online ☐ View Release	United States	Newspaper	Media & Information	470 <sup>[1]</sup> visitors/month
CAPE CORAL  8. Neighboring Communities Swing	Cape Coral Living Magazine Online	United States	Newspaper	Media & Information	458 [1] visitors/month
TIMES OF THE Slands.	Times of the Islands Online ☐ View Release	United States	Newspaper	Media & Information	420 <sup>[1]</sup> visitors/month
Journals	Murray Journal Online ☐ View Release	United States	Newspaper	Media & Information	413 <sup>[1]</sup> visitors/month
Holliston	Holliston Town News Online □ View Release	United States	Newspaper	Media & Information	413 <sup>[1]</sup> visitors/month
KBEW-AM 1560 / KBEW- FM 98.1 COUNTRY [Blue Earth, MN]	KBEW-AM 1560 / KBEW-FM 98.1 COUNTRY [Blomm] MN] Online □ View Release	ue Earth, United States	Broadcast Media	Media & Information	411 <sup>[1]</sup> visitors/month
<b>SPügle</b>	Bradfordville Bugle Online ☐ View Release	United States	Newspaper	Media & Information	396 [1] visitors/month
	Southern Sports Today Online	United States	Broadcast Media	Media & Information	383 <sup>[1]</sup> visitors/month
Greenville.	Greenville Business Magazine Online	United States	Newspaper	Media & Information	380 [1] visitors/month
Journals MILLEAGE LONG CAMPBELLE AND ALLE MANDE CAMPBELLE AND CAMPBELL AND CAMPBELLE A	Millcreek Journal Online	United States	Newspaper	Media & Information	374 <sup>[1]</sup> visitors/month
Journals	Taylorsville Journal Online ☐ View Release	United States	Newspaper	Media & Information	370 [1] visitors/month
OMAHA	Omaha Magazine Online ☐ View Release	United States	Newspaper	Media & Information	367 <sup>[1]</sup> visitors/month
NEWSnet Austin	NEWSnet Austin Online ☐ View Release	United States	Broadcast Media	Media & Information	366 <sup>[1]</sup> visitors/month
Norwood	Norwood Town News Online ☐ View Release	United States	Newspaper	Media & Information	364 <sup>[1]</sup> visitors/month
TAOS NEWS	Taos News Online ☐ View Release	United States	Newspaper	Media & Information	363 [1] visitors/month
EAGLE OLD YOUR COUNTRY	KZZI-FM 95.9 Online ☐ View Release	United States	Broadcast Media	Media & Information	349 [1] visitors/month
	Middletown Life Magazine Online  View Release	United States	Print Media	Media & Information	348 [1] visitors/month

	Case 1.23-CV-01307-LR	Document 65-7	Filed 10/11/24	raye 20 01 4	_
( HOA	WNOW Frankly Media Online □ View Release	United States	Broadcast Media	Media & Information	347 <sup>[1]</sup> visitors/month
STYLE	Style Magazine Online ☐ View Release	United States	Newspaper	Media & Information	342 [1] visitors/month
THE PODCAST PARK	The Podcast Park Online ☐ View Release	United States	Broadcast Media	Media & Information	332 <sup>[1]</sup> visitors/month
BONITA  SESTERO and Neighboring Communities	Bonita & Estero Magazine Online ☐ View Release	United States	Newspaper	Media & Information	318 [1] visitors/month
NEWSnet Boise	NEWSnet Boise Online ☐ View Release	United States	Online News Sites & Other Influencers	Media & Information	311 <sup>[1]</sup> visitors/month
95.3 Miles 4 Miles	WHLF 95.3 FM [South Boston, VA] Online □ View Release	United States	Broadcast Media	Media & Information	310 [1] visitors/month
CHRISTABELLES CLOSET	Christabelle's Closet Online □ View Release	United States	Blog	Retail & Consumer	307 <sup>[1]</sup> visitors/month
Hattiesburg.Com	Hattiesburg.com Online ☐ View Release	United States	Online News Sites & Other Influencers	Media & Information	300 [1] visitors/month
	The Dam 94.3-FM Online ☐ View Release	United States	Broadcast Media	Media & Information	300 <sup>[1]</sup> visitors/month
eNews Park Forest	eNews Park Forest Online ☐ View Release	United States	Newspaper	Media & Information	295 [1] visitors/month
	NEWSNet Portland Online □ View Release	United States	Broadcast Media	Media & Information	294 <sup>[1]</sup> visitors/month
Quality First Media, Tampa, Florida	Quality First Media, Tampa, Florida Online  View Release	United States	Newspaper	Media & Information	290 <sup>[1]</sup> visitors/month
KYNT-AM 1450	KYNT-AM 1450 Online ☐ View Release	United States	Broadcast Media	Media & Information	274 <sup>[1]</sup> visitors/month
	WPTM 102.3-FM [Weldon, NC] Online ☐ View Release	United States	Broadcast Media	Media & Information	270 <sup>[1]</sup> visitors/month
983	WLUS 98.3 FM [Clarksville, VA] Online ☐ View Release	United States	Broadcast Media	Media & Information	268 <sup>[1]</sup> visitors/month
PIONEER	The Pioneer Online ☐ View Release	United States	Newspaper	Media & Information	259 [1] visitors/month
	NEWSnet Buffalo Online ☐ View Release	United States	Broadcast Media	Media & Information	259 <sup>[1]</sup> visitors/month
KMLK	KMLK 98.7-FM [El Dorado, AR] Online ☐ View Release	United States	Broadcast Media	Media & Information	256 <sup>[1]</sup> visitors/month
680 91.7FM	WCNN 680 AM / 93.7 FM [Atlanta, GA] Online  View Release	United States	Broadcast Media	Media & Information	255 <sup>[1]</sup> visitors/month

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	Case 1.23-CV-01907-LR	Document 65-7	Filed 10/11/24	Faye 29 01 4	_
	NEWSnet Los Angeles Online	United States	Online News Sites & Other Influencers	Media & Information	241 <sup>[1]</sup> visitors/month
	NEWSNet Santa Barbara Online ☐ View Release	United States	Online News Sites & Other Influencers	Media & Information	233 <sup>[1]</sup> visitors/month
	WWDW 107.7-FM [Alberta, VA] Online □ View Release	United States	Broadcast Media	Media & Information	232 <sup>[1]</sup> visitors/month
ood Magazine	hood Magazine Online  View Release	United States	Print Media	Media & Information	210 <sup>[1]</sup> visitors/month
67 WSHV	WSHV 96.7 FM [South Hill, VA] Online ☐ View Release	United States	Broadcast Media	Media & Information	198 [1] visitors/month
Journals HALPHY ONE CONCENTY THUMAN	Draper Journal Online ☐ View Release	United States	Newspaper	Media & Information	195 <sup>[1]</sup> visitors/month
J <sub>arish</sub> News	Parish News [New Orleans, LA] Online □ View Release	United States	Newspaper	Media & Information	194 <sup>[1]</sup> visitors/month
ewind 1019	WKSK 101.9 FM [South Boston, VA] Online ☐ View Release	United States	Broadcast Media	Media & Information	194 [1] visitors/month
	NEWSNet Pittsburgh Online ☐ View Release	United States	Broadcast Media	Media & Information	176 <sup>[1]</sup> visitors/month
1000 arrabet	Z106.3 FM Online ☐ View Release	United States	Broadcast Media	Media & Information	175 <sup>[1]</sup> visitors/month
	NEWSNet Norfolk Online ☐ View Release	United States	Broadcast Media	Media & Information	173 <sup>[1]</sup> visitors/month
	KCCR-AM 1240 [Pierre, SD] Online ☐ View Release	United States	Broadcast Media	Media & Information	165 [1] visitors/month
	KCCR-FM 95.3 [Pierre, SD] Online ☐ View Release	United States	Broadcast Media	Media & Information	160 <sup>[1]</sup> visitors/month
	WTRG 97.9-FM [Weldon, NC] Online ☐ View Release	United States	Broadcast Media	Media & Information	144 [1] visitors/month
ville's Classic Hits	WWDN 104.5 FM [Danville, VA] Online □ View Release	United States	Broadcast Media	Media & Information	141 <sup>[1]</sup> visitors/month
	NEWSNet West Palm Beach Online  View Release	United States	Broadcast Media	Media & Information	129 [1] visitors/month
	NEWSNet Sioux Falls Online □ View Release	United States	Broadcast Media	Media & Information	129 <sup>[1]</sup> visitors/month
	NEWSNet San Antonio Online ☐ View Release	United States	Broadcast Media	Media & Information	129 [1] visitors/month
	NEWSNet Salt Lake City Online □ View Release	United States	Broadcast Media	Media & Information	129 <sup>[1]</sup> visitors/month

# Case 1:23-cv-01967-ER Document 83-7 Filed 10/17/24 Page 30 of 42

	Case 1.23-CV-01907-LR	Document 65-7	Fileu 10/11/24	rage 30 01 4	_
	NEWSNet Sacremento Online	United States	Online News Sites & Other Influencers	Media & Information	129 <sup>[1]</sup> visitors/month
	NEWSNet Quincy Online ☐ View Release	United States	Broadcast Media	Media & Information	129 <sup>[1]</sup> visitors/month
	NEWSNet Odessa Online ☐ View Release	United States	Broadcast Media	Media & Information	129 <sup>[1]</sup> visitors/month
	NEWSnet Myrtle Beach Online ☐ View Release	United States	Broadcast Media	Media & Information	129 [1] visitors/month
NEWSnet Miami	NEWSnet Miami Online ☐ View Release	United States	Broadcast Media	Media & Information	129 <sup>[1]</sup> visitors/month
	East Hanover Florham Park Life Online  View Release	United States	Print Media	Media & Information	124 [1] visitors/month
	NEWSnet Las Vegas Online ☐ View Release	United States	Broadcast Media	Media & Information	123 <sup>[1]</sup> visitors/month
	NEWSnet Hawaii Online ☐ View Release	United States	Online News Sites & Other Influencers	Media & Information	123 [1] visitors/month
	NEWSnet Fresno Online ☐ View Release	United States	Broadcast Media	Media & Information	114 <sup>[1]</sup> visitors/month
FACE MAGAZINE	FACE Magazine Online □ View Release	United States	Newspaper	Media & Information	103 <sup>[1]</sup> visitors/month
Business Class News	Business Class News Online ☐ View Release	United States	Blog	Media & Information	102 <sup>[1]</sup> visitors/month
KDAM-FM 94.3	KDAM-FM 94.3 Online ☐ View Release	United States	Broadcast Media	Media & Information	95 [1] visitors/month
Indicanews	indica News [San Ramon, CA] Online □ View Release	United States	Online News Sites & Other Influencers	Media & Information	91 <sup>[1]</sup> visitors/month
KQRQ-FM 92.3	KQRQ-FM 92.3 Online ☐ View Release	United States	Broadcast Media	Media & Information	91 <sup>[1]</sup> visitors/month
	Newsradio KOTA [Rapid City, SD] Online	United States	Broadcast Media	Media & Information	91 <sup>[1]</sup> visitors/month
	NEWSnet Columbia Online ☐ View Release	United States	Broadcast Media	Media & Information	87 [1] visitors/month
BOREAL	Boreal Community Media Online  View Release	United States	Newspaper	Media & Information	78 <sup>[1]</sup> visitors/month
	NEWSNet Orlando Online ☐ View Release	United States	Broadcast Media	Media & Information	75 [1] visitors/month
SPORTS - TALK	WFOM 106.3 FM / 1230 AM [Atlanta, GA] Online  View Release	United States	Broadcast Media	Media & Information	71 <sup>[1]</sup> visitors/month

			1 11CG 10/11/24	1 age 01 01 42	
COUNTRY	WMPW 105.9 FM [Danville, VA] Online ☐ View Release	United States	Broadcast Media	Media & Information	61 <sup>[1]</sup> visitors/month
newstalk 97.1-105.9 fm. PROI WISS.	NewsTalk 97.1-FM / WSMY 1080-AM [Weldon, NC] Online	United States	Broadcast Media	Media & Information	60 [1] visitors/month
NEWSNet Waco	NEWSNet Waco Online ☐ View Release	United States	Broadcast Media	Media & Information	54 [1] visitors/month
	NEWSnet Nashville Online ☐ View Release	United States	Broadcast Media	Media & Information	50 [1] visitors/month
	NEWSnet Monterey Online ☐ View Release	United States	Online News Sites & Other Influencers	Media & Information	50 [1] visitors/month
	NEWSnet Minneapolis Online ☐ View Release	United States	Broadcast Media	Media & Information	50 [1] visitors/month
	NEWSNet Tampa Online ☐ View Release	United States	Broadcast Media	Media & Information	43 [1] visitors/month
Classic 95.7 fm	WWZW-FM Classic story96.7 [Lexington, VA] Online ☐ View Release	United States	Broadcast Media	Media & Information	29 [1] visitors/month
Oregon Family	Oregon Family Online ☐ View Release	United States	Print Media	Media & Information	23 <sup>[1]</sup> visitors/month
Vermilion Photojournal, Vermilion, Ohio	Vermilion Photojournal, Vermilion, Ohio Online ☐ View Release	United States	Newspaper	Media & Information	Not Available
The Valley Advantage, Archbald, Pennsylvania	The Valley Advantage, Archbald, Pennsylvania Online ☐ View Release	United States	Newspaper	Media & Information	Not Available
The Franklin, Franklin, Tennessee	The Franklin, Franklin, Tennessee Online ☐ View Release	United States	Newspaper	Media & Information	Not Available
San Juan Sun, Espanola, New Mexico	San Juan Sun, Espanola, New Mexico Online ☐ View Release	United States	Newspaper	Media & Information	Not Available
Jackson Township News, Jackson Township, New Jersey	Jackson Township News, Jackson Township, New Jersey Online ☐ View Release	United States	Newspaper	Media & Information	Not Available
The Post & Mail, Columbia City, Indiana	The Post & Mail, Columbia City, Indiana Online ☐ View Release	United States	Newspaper	Media & Information	Not Available
Delmarva Home Show, Salisbury, Maryland	Delmarva Home Show, Salisbury, Maryland Online  View Release	United States	Newspaper	Media & Information	Not Available
	Today's Family Magazine Online ☐ View Release	United States	Print Media	Media & Information	Not Available
	The Palmetto Network Online ☐ View Release	United States	Online News Sites & Other Influencers	Media & Information	Not Available
	San Clemente Journal Online ☐ View Release	United States	Print Media	Media & Information	Not Available

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Pooler Magazine Online	United States	Print Media	Media & Information	Not Available
Newark Life Magazine Online	United States	Print Media	Media & Information	Not Available
Effingham Magazine Online	United States	Print Media	Media & Information	Not Available
- 1 11 1				

Sources: [1] [2] Alexa, [3] siteworthtraffic.com [4] Cision Digital Reach

<sup>\*</sup>Data sources: [1]

<sup>\*</sup>The data cited here by SimilarWeb represents site traffic data of worldwide unique visitors on desktop and mobile devices. Data is updated monthly.

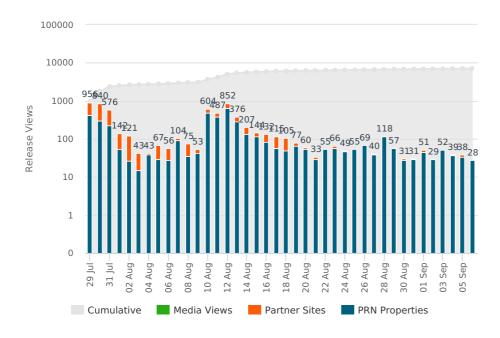
#### **Traffic**

# Overview

RELEASE VIEWS & HITS	8.1K	MULTIMEDIA	(
Release Views	7.9K		
Media Views	40		
Public Views	7.9K		
Partner Sites	2.6K		
PR Newswire Properties	5.3K		
Release Web Crawler Hits	154		

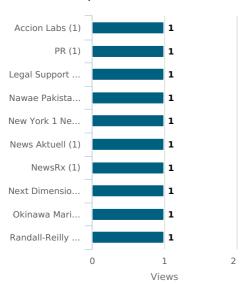
#### **Release Views**

Release Views Over Time



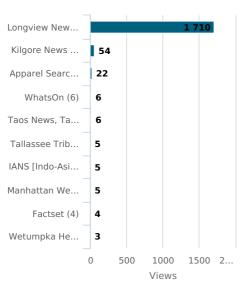
Media Views on PR Newswire for Journalists

Top 10 Outlets



#### Views on Partner Sites

Top 10 Sites



#### Traffic to PR Newswire Properties

Type of Views



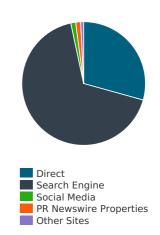
#### Views

Туре	Views
Desktop Views	2,100
Mobile/Tablet Views	3,175
Total Views on PR Newswire Properties	5,275

#### **External Traffic Sources**

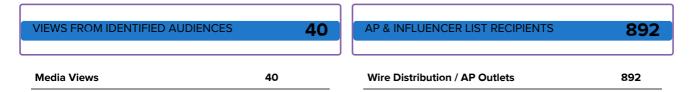
Understand how viewers found your release.

Source Type	Source	Instances
Direct		1,548
Direct	Direct	1,548
∨ Search Engine (4)		3,556
Search Engine	Google	3,539
Search Engine	Bing	10
Search Engine	DuckDuckGo	5
Search Engine	Yahoo!	2
∨ Social Media (3)		67
Social Media	LinkedIn	36
Social Media	Facebook	30
Social Media	Х	1
✓ PR Newswire Properties (1)		68
PR Newswire Properties	prnewswire.com	68
V Other Sites (15)		41
Other Sites	tinyurl.com	8
Other Sites	statics.teams.cdn.office.net	5
Other Sites	youtube.com	5
Other Sites	linkin.bio	5
Other Sites	search.brave.com	4
Other Sites	news-journal.com	3
Other Sites	app.asana.com	2
Other Sites	com.linkedin.android	2
Other Sites	wdtn.com	1
Other Sites	iris.prnewswire.com	1
Other Sites	kilgorenewsherald.com	1
Other Sites	wgntv.com	1
Other Sites	dnserrorassist.att.net	1
Other Sites	fox5sandiego.com	1
Other Sites	ecosia.org	1
Total		5,280



#### **Audience**

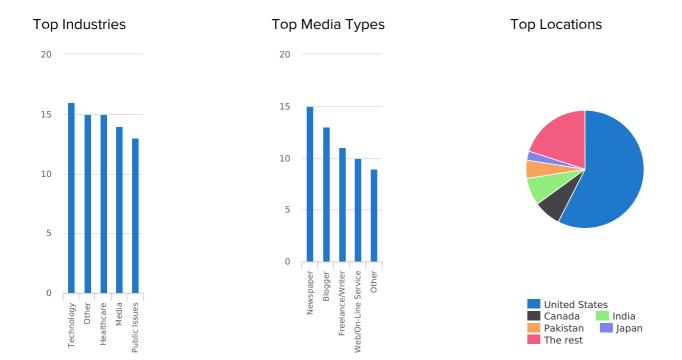
## Overview



#### **Audience Summary**

#### Media Demographics

A break down of the industries covered, the media types and the locations of the journalists & bloggers accessing your release on PR Newswire for Journalists.



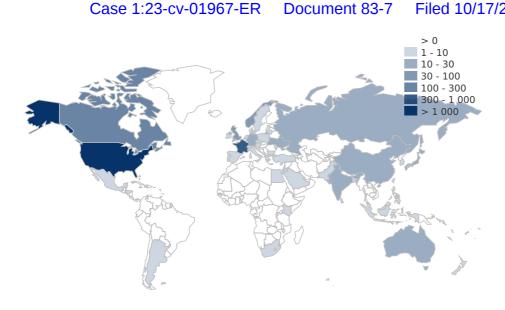
#### **Geo-segmentation**

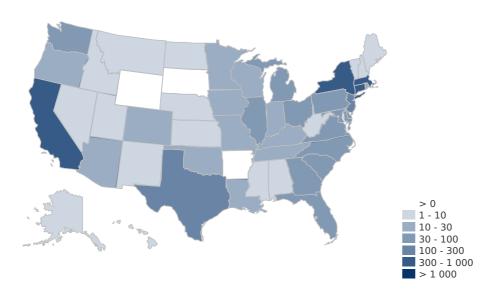
See where views of your release originated. Hover over map to see totals by location.

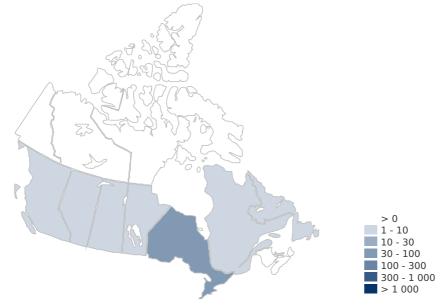
Select a region:

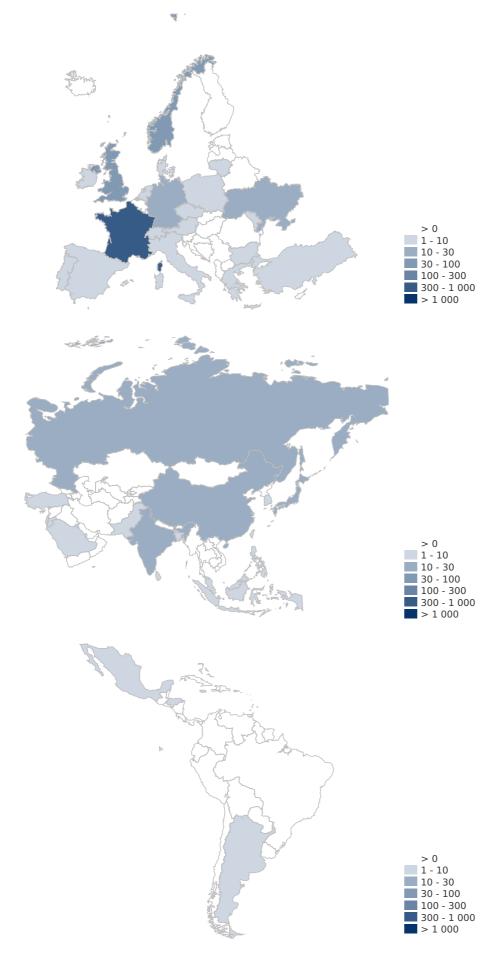


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**Audience Details** 

#### Media Views

See the details of each media outlet from PR Newswire for Journalists that viewed your release.

Outlet	Industry	Source Type	Location	-
accion Labs	Auto, Entertainment, Environment	Blogger, Radio	Greece	
R	Technology	Other	Malaysia	
egal Support World	Other	Blogger, Freelance/Writer	United States	
awae Pakistan	Public Issues	Web/On-Line Service	Pakistan	
ew York 1 News	Other	Television	United States	
ews Aktuell	Other	Wire Service	Switzerland	
ewsRx	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Web/On-Line Service	United States	
ext Dimension Story	Other	Other	United Kingdom	
kinawa Marine	Broadcast, Environment, Features, Financial Services, Media, Public Issues, Technology, Transportation, Travel	Freelance/Writer, Newspaper, Web/On-Line Service, Wire Service	Japan	
andall-Reilly Publishing o.	Transportation	Trade Periodicals	United States	
ingsport Times-New	Other	Newspaper	United States	
cot Scoop	Features	Newspaper	United States	
pap Opera Network / rrolLewis.com	Broadcast, Entertainment, Features, Media, Technology, Travel	Blogger, Freelance/Writer, Other, Television	United States	
peniz	Auto	Blogger	United States	
TEWAWEL News & Auto, Broadcast, Consumer Products, Energy, Entertainment, formation Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel		Radio, Television, Web/On-Line Service, Wire Service	United States	
mes of News 24x7	Healthcare	Blogger, Other, Web/On-Line Service	India	
JET/WFXP/Nexstar roadcasting	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Financial Services, General Business, Healthcare, Media, Public Issues, Sports, Technology, Transportation, Travel	Blogger, Newspaper, Television	United States	
SAZ	Financial Services	Television	United States	
razzyMag	Auto, Entertainment, Financial Services, Healthcare, Media, Sports, Technology, Travel	Blogger, Other, Web/On-Line Service	India	
cksonville Journal- ourier	Auto, Consumer Products, Energy, Entertainment, Environment, Features, General Business, Healthcare, Media, Other, Public Issues, Technology, Transportation	Newspaper	United States	
dams Editorial Services	Consumer Products, Environment, Healthcare, Heavy Industry, Other, Technology	Freelance/Writer, Trade Periodicals	United States	
aily News	Other	Other	South Africa	
mosEsp	Entertainment, Media	Other	United States	
oc.	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Radio	Canada	
	Financial Services, General Business, Public Issues	Blogger	Monaco	

Outlet	Industry	Source Type	Location	View
cision	Auto	Blogger	United States	
Cision (PR Newswire)	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Blogger, Consumer Periodicals, Freelance/Writer, Newspaper, Other, Radio, Television, Trade Periodicals, Web/On-Line Service, Wire Service	United States	
Cognizant	Auto, General Business, Technology	Blogger, Freelance/Writer	India	
Cutter Consortium, Data Analytics & Digital Technologies Advisor	Financial Services, Healthcare, Technology	Blogger, Freelance/Writer, Trade Periodicals, Web/On-Line Service	United States	
Delion	Environment, Financial Services, General Business, Other, Technology	Blogger, Newspaper	Canada	
Houston Chronicle	Features	Newspaper	United States	
Economic Review	Auto, Energy, Features, Financial Services, Media, Public Issues, Sports	Freelance/Writer, Newspaper, Trade Periodicals	Pakistan	
Feather River Bulletin	Other	Newspaper	United States	
ForkLog	Media, Technology	Freelance/Writer, Newspaper	Russia	
Freelancer	Entertainment, Features, Healthcare	Freelance/Writer, Newspaper	United States	
Freelancer	Other	Trade Periodicals	United States	
Gaceta UNAM	Environment, Features, Healthcare, Media, Public Issues, Sports, Travel	Newspaper, Web/On-Line Service	Mexico	
GHEP, Rock and Art Culture magazine, Roots Music	Energy, Environment, Features, Healthcare, Media, Public Issues, Technology	Freelance/Writer, Newspaper, Other	Canada	
heart & soul	Entertainment, Healthcare, Travel	Consumer Periodicals, Radio, Web/On-Line Service	United States	
Young Voices	Consumer Products, Healthcare, Public Issues	Newspaper	United	

#### **Associated Press Outlets**

PR Newswire's wire newslines include targeted distribution to the Associated Press, an essential global news network that delivers content to an extensive set of media platforms and formats. The list below represents the outlets you reach via this partnership.

Outlet Name	City	State	Location	Туре	Audience
C-SPAN	Washington	DC	US	Television	86,200,000 Subscribers
Scribd, Inc.	San Francisco	CA	US	Aggregator	43,531,670 Visitors per Month
FoxNews.com	New York	NY	US	Online	32,516,438 Visitors per Month
CBS News Radio	New York	NY	US	Radio	30,000,000 Broadcast Audience
New York Times Digital	New York	NY	US	Newspaper	29,886,442 Visitors per Month
Apple Inc.	Cupertino	CA	US	Organization/Company	29,709,459 Visitors per Month
CNBC.com	Englewood Cliffs	NJ	US	Online	26,089,259 Visitors per Month
CBSnews.com	New York	NY	US	Online	26,080,671 Visitors per Month
abcnews.com	New York	NY	US	Online	24,167,779 Visitors per Month
U.S. News & World Report	Washington	DC	US	Magazine	23,945,529 Visitors per Month

## **Engagement**

#### **Overview**

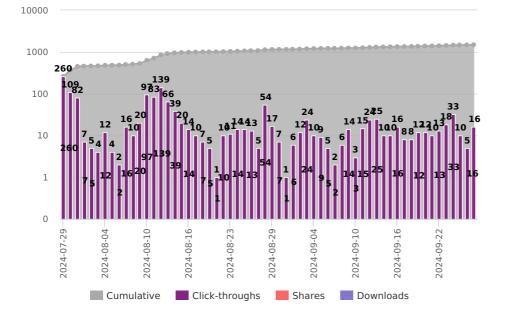
TOTAL ENGAGEMENT ACTIONS

1.5K

Click-throughs 1.5K

#### **Engagement Timeline**

See when your audience engaged with your release.



# **Engagement Details**

A break down of click-throughs, shares and other engagement actions.

#### Click-throughs

The number of times your release sent visitors to the pages you linked to

URL	Click- throughs
http://www.cpluscollagenlawsuit.com/	1,046
https://www.cpluscollagenlawsuit.com/?utm_source=PRN&utm_medium=MoreInfo&utm_campaign=DDG	187
https://www.cpluscollagenlawsuit.com/?utm_source=PRN	150
$https://www.cpluscollagenlawsuit.com/?utm\_source=PRN\&utm\_medium=SettlementWebsite\&utm\_campaign=DDG$	129
Total	1,512

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