

# EXHIBIT A

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12 *Attorneys for Plaintiff and the Proposed Class*

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA

15 Jane Doe,  
16  
17 Plaintiff,  
18  
19 vs.  
20 YouTube, Inc.,  
21 Defendant.

Case No. 4:20-cv-7493 (N.D. Cal.)

CLASS ACTION

DECLARATION OF MONICA MURRAY IN  
SUPPORT OF INTERIM POST-  
DISTRIBUTION ACCOUNTING

Date: April 8, 2024  
Time: 9:01 a.m.  
Judge: Hon. Yvonne Gonzalez Rogers  
Location: Courtroom 1

22 I, Monica Murray, declare and state as follows:

23 1. I am a Case Coordinator with KCC Class Action Services, LLC (“KCC”), located  
24 at Los Angeles, California. Pursuant to the Order Granting Preliminary Approval of Class Action  
25 Settlement and Setting Deadlines for Notice, Objection, Exclusion, and Final Fairness Hearing (the  
26 “Preliminary Approval Order”) dated September 8, 2022, the Court appointed KCC as the Claims  
27 Administrator in connection with the proposed Settlement of the above-captioned Action. I have  
28 personal knowledge of the facts set forth herein. If called as a witness, I can and would testify

1 competently to them. I make this declaration pursuant to 28 U.S.C. § 1746.

2 2. This Declaration supplements my previous declarations, Docs. 67-6, 78-8, for the  
3 purpose of updating the Parties and the Court with current settlement fund distribution information.

4 **PRE-DISTRIBUTION**

5 3. On November 7, 2022, KCC received an initial payment of \$150,000 from Google  
6 LLC for the *Doe v. YouTube, Inc.* Settlement Fund.

7 4. On May 24, 2023, KCC caused the mailing of the Payment Option Notice postcard  
8 to be sent to the 7 Class Members whose records on the class list had a valid mailing address only.  
9 A true and correct copy of the Mailing Address Update Notice is attached hereto as Exhibit A. On  
10 May 25, 2023, KCC caused the email Payment Option Notice to be deployed to the 1421 Class  
11 Members whose records on the Class List had valid email and mailing addresses. A true and correct  
12 copy of the Payment Option Notice is attached hereto as Exhibit B. On May 25, 2023, KCC caused  
13 the email Mailing Address Update Notice to be sent to the 4 Class Members whose records on the  
14 Class List had a valid email address only. A true and correct copy of the Mailing Address Update  
15 Email Notice is attached hereto as Exhibit C.

16 5. The notices sent informed Class Members that payment selections and address  
17 updates for the distribution must be submitted by June 28, 2023. KCC received a total of 101 Paypal  
18 selections and 160 VenMo selections.

19 6. On August 3, 2023, KCC received the remaining funds of \$4,552,544.80 for the *Doe*  
20 *v. YouTube, Inc.* Settlement Fund.

21 **DISTRIBUTION**

22 7. On August 22, 2023, KCC mailed two checks in the amount of \$1,451,998.41 total  
23 to Burns Charest LLP and Joseph Saveri Law Firm, LLP. This represented the amount of the  
24 attorneys' fees and costs approved by the Court. Both checks have been cashed.

25 8. On August 24, 2023, KCC mailed one check in the amount of \$20,000 to the Named  
26 Plaintiff, "Jane Doe". This represented the amount of the service award approved by the Court. The  
27 check has been cashed.

1           9.       On August 24, 2023, KCC made payments of \$2,222.25 each to 1,422 Class  
2 Members. The 4 Class Members described in Paragraph 4 were included in the distribution but  
3 were not mailed checks as they had not provided either mailing addresses or electronic payment  
4 information. By including these individuals in the distribution, KCC retained the ability to reissue  
5 a check payment should KCC receive their mailing addresses. In addition, 6 of the 1,432 Class  
6 Member records were considered duplicate at the time of distribution.

Payment	Payments Issued	Stale Date
Check	1161	11/22/2023
PayPal	101	9/23/2023
Venmo	160	9/23/2023

#### POST-DISTRIBUTION

13           10.       After class checks were mailed on August 24, 2023, 20 were returned as  
14 undeliverable mail; KCC conducted address searches using credit and other public source  
15 databases, and checks were reissued to updated addresses. An additional 62 checks were reissued  
16 to updated addresses at the request of the Class Members.

Date Mailed	Number of Checks	Stale Date
9/15/2023	67	12/15/2023
11/17/2023	15	1/16/2024

19           11.       5 electronic payments were returned and reissued as checks sent to the original  
20 mailing addresses on file for those Class Members. As of the date of this declaration, 1 of the 5  
21 checks remains uncashed and will expire on January 30, 2024.

22           12.       314 checks remain uncashed, totaling \$697,786.50. Of the uncashed checks, 283

1 have passed the stale date, totaling \$628,896.75. Of the uncashed checks, 31 remain valid, totaling  
2 \$68,889.75.

3 **TELEPHONE AND EMAIL COMMUNICATIONS**

4 13. KCC established and continues to maintain a toll-free telephone number (888-710-  
5 2838) for potential Class Members to call and obtain information about the Settlement, request a  
6 Notice, and/or seek assistance from a live operator during regular business hours. The telephone  
7 hotline became operational on October 28, 2022, and is accessible Monday-Friday 8 am – 8 pm  
8 EST. As of November 24, 2023, KCC has received a total of 443 calls to the telephone hotline.  
9 KCC received 58 calls prior to June 28, 2023, and 371 calls after this date.

10 14. KCC established and continues to maintain a shared mailbox for potential Class  
11 Members to email and obtain information about the Settlement, request a Notice, and/or seek  
12 assistance from an administrator during regular business hours. The shared mailbox became  
13 operational on October 28, 2022. As of November 24, 2023, KCC has received a total of 358  
14 emails to the shared mailbox. KCC received 100 emails prior to June 28, 2023, and 258 emails after  
15 this date.

16 15. In these communications, 41 individuals claimed that they believed that there were  
17 members of the Class but had not received a Per Capita Payment.

18 **ADMINISTRATION COSTS**

19 16. As of the date of this declaration, KCC incurred administration costs of  
20 \$64,163.20. Should KCC be asked to do additional work outside of the original scope of the  
21 administration estimate, additional administration costs may be incurred.

22  
23  
24 Executed on November 30, 2023 at Los Angeles, CA.

25  
26 *Monica Murray*

27 \_\_\_\_\_  
[Monica Murray]