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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MICHAEL CORONA, CHRISTINA MATHIS,
et al., individually and on behalf of others
similarly situated,

Plaintiffs,

vs.

SONY PICTURES ENTERTAINMENT INC.,

Defendant.

CASE NO. 2:14-CV-09600-RGK-E

**SUPPLEMENTAL DECLARATION OF
LORI L. CASTANEDA REGARDING
MAILED NOTICE, CLAIMS, OPT-OUTS,
AND OBJECTIONS**

Judge: Hon. R. Gary Klausner
Courtroom: 850

1 I, LORI L. CASTANEDA, declare and state as follows:

2 1. I am a Vice President of Operations of the Garden City Group, LLC (“GCG”).
3 This Declaration is based upon my personal knowledge, as well as upon information provided to
4 me by counsel and experienced GCG employees working under my supervision. If called upon
5 to do so, I could and would be competent to testify thereto.

6 **SUPPLEMENTAL DATA**

7 2. As noted in the January 29, 2016 Declaration of Lori L. Castaneda, 437,914
8 postcard notices were mailed by GCG to Settlement Class Members (“SCMs”) on January 22,
9 2016. On January 28, 2016, GCG discovered that the data provided to GCG contained records
10 for approximately 2% of SCMs where the first name was incorrect but last name and address
11 information were otherwise correct. GCG promptly notified counsel. Sony Pictures
12 Entertainment (“SPE”) then undertook a review of the records provided to GCG in November
13 2015, and after this review, determined that this error was the result of a misaligned column in
14 the spreadsheet provided to GCG by SPE. SPE notified GCG that as a result of this misaligned
15 column: (1) the initial data contained 8,876 records with incorrect first name information but
16 correct last name and address information; (2) the initial data for 422 SCMs contained two
17 records, one record with correct first name information and the other record with incorrect first
18 name information, and that this population of 422 SCMs were sent two notices in the initial
19 mailing; and (3) 423 SCM records were inadvertently omitted from the initial data.

20 3. These issues were promptly addressed upon discovery. On or about February 2,
21 2016, SPE Counsel provided GCG with two electronic files containing updated name
22 information and last known mailing addresses for all of the affected individuals from each of the
23 above-identified categories, totaling 9,755 identifiable SCMs. The first file contained updated
24 name data for 9,298 SCMs that were previously provided to GCG but were identified as
25 containing incorrect first name data (the 8,876 who received one postcard with an incorrect first
26 name and the 422 who received two postcards, one of which had an incorrect first name) and 34
27 records previously provided to GCG with correct name data. The second file contained new data
28 for the 423 SCM records that were not previously provided to GCG in the initial data files.

4. GCG promptly loaded the 423 new SCM records to the data for notice mailing.

1 Additionally, GCG promptly analyzed the 9,298 SCM records where the first name data was
2 identified as being incorrect and updated records when the appropriate record was identified.
3 Through this review, GCG identified 9 additional SCMs who were not mailed notices on January
4 22, 2016. Name and address information for those 9 new records was loaded into the database.
5 In total, GCG was able to match and update 8,866 records with corrected first name information,
6 including one duplicate record.

7 5. Additionally, GCG identified the 422 records to which two notices were sent. The
8 422 records containing incorrect information were systematically disabled so that duplicate
9 claims could not be filed.

10 **SUPPLEMENTAL NOTICE MAILING**

11 6. On February 10, 2016, GCG mailed the initial postcard notice, attached hereto as
12 **Exhibit A**, to the 432 SCMs described in paragraph 4 above. This mailing consisted of the 423
13 newly identified SCMs provided by SPE, as well as the 9 SCMs who were reloaded into the data
14 as new records.

15 7. On February 11, 2016, GCG mailed a supplemental postcard notice, attached
16 hereto as **Exhibit B**, to the 422 SCMs who may have received two notices, as described above.
17 The supplemental postcard contained the SCMs' correct first names, and informed the SCMs that
18 they may have received a postcard containing incorrect first name information, in addition to a
19 postcard containing the correct name, and instructed these SCMs to use the information on the
20 supplemental postcard going forward.

21 8. On February 16, 2016, GCG mailed a revised postcard notice, attached hereto as
22 **Exhibit C**, to 8,865 SCMs whose records were updated and had mailable addresses. The revised
23 postcard informed the SCMs that the initial postcard they received contained an incorrect first
24 name and that the information had been corrected in GCG's records.

25 9. In GCG's judgment, the effectiveness of the Notice Program¹ was not altered due
26 to the inadvertent errors in the initial notice mailing, which were quickly corrected as described
27 in paragraphs 6, 7, and 8. The 432 class members who were not initially mailed a notice were
28 promptly sent notice well in advance of any deadlines a class member had to assert his or her
rights. The class member records affected by the errors in first name data had the correct last

¹ Unless otherwise defined, capitalized terms have the meaning provided in the Settlement Agreement.

1 name and address information which, as evidenced by class member communications, still
2 allowed the notice to be delivered to the intended address, and were also promptly mailed new
3 additional notice containing correct full name information well in advance of any deadlines a
4 class member had to assert his or her rights.

5 **CLAIMS**

6 10. SCMs wishing to claim benefits under the Settlement are required to submit
7 completed Preventive Measures Claim Forms, either through the Settlement Website or by U.S.
8 Mail, through April 23, 2016 (postmark deadline for mailed claim forms), and/or Identity
9 Theft/Misuse Claim Forms, either through the Settlement Website or by U.S. Mail, through
10 December 31, 2017.

11 11. As of February 16, 2016, GCG has received 1,452 undocumented Preventive
12 Measures Claims and 160 documented Preventive Measures Claims. As the deadline to submit
13 Preventive Measures Claim Forms is April 23, 2016, GCG anticipates receipt of additional
14 timely claims.

15 12. As of February 16, 2016, GCG has received a total of 25 Identity Theft/Misuse
16 Claim Forms, including 13 from PII-Disclosed SCMs and 12 from Non-PII-Disclosed SCMs. As
17 the deadline to submit Identity Theft/Misuse Claim Forms is December 31, 2017, GCG
18 anticipates receipt of additional timely claims.

19 **EXCLUSIONS**

20 13. Pursuant to Paragraph 55 of the Settlement Agreement, SCMs who wish to
21 exclude themselves from the Settlement Class are required to submit a written request for
22 exclusion with the Settlement Administrator postmarked by March 9, 2016. As of February 16,
23 2016, GCG has received 9 timely requests for exclusion from SCMs. The attached **Exhibit D**
24 reports on the SCMs who have submitted exclusion requests.

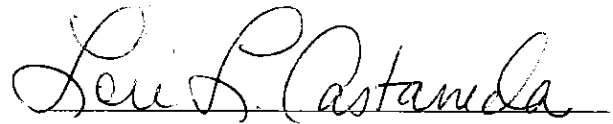
25 **OBJECTIONS**

26 14. Pursuant to Paragraph 56 of the Settlement Agreement, SCMs who have not
27 excluded themselves from the Settlement Class may object to the Settlement by sending a written
28 objection to the Clerk of the Court, Class Counsel, and SPE's counsel, postmarked by March 9,

1 2016. As of February 16, 2016, GCG has not received or been provided with any objections from
2 SCMs.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Executed this 17th day of February, 2016 in Seattle, Washington.

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7 Lori L. Castaneda
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EXHIBIT A

the Sony Pictures Entertainment Cyberattack

For more information, visit www.CyberattackSettlement.com or call 1-855-907-3142

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

A Settlement has been proposed in a lawsuit against Sony Pictures Entertainment Inc. (“*Corona v. SPE*”) relating to the cyberattack on SPE in the fall of 2014 (the “SPE Cyberattack”). If you were a current or former corporate or production employee of SPE or one of its subsidiaries as of November 24, 2014, you are a class member. If you were not a current or former corporate or production employee of SPE or one of its subsidiaries as of November 24, 2014, but you are receiving this notice about this Settlement by mail, SPE has identified you as someone whose Personally Identifiable Information was disclosed on the Internet as a result of the SPE Cyberattack, and you are a class member. Class members who reside within and outside the United States may claim benefits under this Settlement.

What benefits does the Settlement provide?

Identity Protection Services for Free

SPE will provide class members with certain identity protection services, free of charge, through AllClear ID (“AllClear”) and IDT911.

- IDT911: Class members residing in Canada can enroll in IDT911, free of charge, for coverage through December 31, 2017. If you previously enrolled in credit monitoring in connection with the SPE Cyberattack through AllClear Pro Canada, your coverage will not be extended through December 31, 2017 and you must enroll in IDT911 to receive credit monitoring and an identity theft insurance policy, as well as other services. Enroll at idtcabreachresponse.com or by calling IDT911 at 1-866-272-1415. The deadline to enroll for free is **May 23, 2016**. Failure to enroll in IDT911 may affect your eligibility to take an Identity Theft/Misuse Claim.
- AllClear Secure: Class members residing in Canada will also be provided with coverage under AllClear Secure, free of charge, through December 31, 2017. Please note that IDT911 provides benefits and services (including credit monitoring and a \$1 million identity protection insurance policy) that are not part of AllClear Secure. You must enroll in IDT911 if you want to get those benefits and services.

Cash Payments for Valid Claims

Eligible class members can file claims for payments. To file a claim, visit www.CyberattackSettlement.com. There are two types of claims:

- You can file a Preventive Measures Claim by no later than **April 23, 2016** if you have incurred actual costs, or spent time, before October 19, 2015, taking measures to avoid Identity Theft/Misuse resulting from the SPE Cyberattack (for example, if you bought credit monitoring services, froze your credit, or obtained credit reports because of the SPE Cyberattack), for which you have not already been reimbursed. Valid claims will be paid from a \$2 million preventive measures fund.
- You can file an Identity Theft/Misuse Claim by no later than **December 31, 2017**, if you have suffered, or do suffer, actual, unreimbursed losses from Identity Theft/Misuse as a direct result of the SPE Cyberattack. Valid claims will be paid as claims are validated and approved, up to an aggregate maximum of \$2.5 million.
- For more information, including eligibility and documentation requirements, visit www.CyberattackSettlement.com.

How can I get these benefits?

To enroll in IDT911 for free, visit idtcabreachresponse.com or call IDT911 at 1-866-272-1415. To file a claim for payment, submit a claim form online at www.CyberattackSettlement.com, or you can submit a claim form by mail. Visit www.CyberattackSettlement.com for more information, including eligibility and documentation requirements.

What are my rights?

If you do nothing, you will be bound by the Settlement. If you want to keep the right to sue SPE yourself, you must exclude yourself from the Settlement by **March 9, 2016**. If you stay in the Settlement, you may object to the Settlement or Class Counsel’s fee application. The deadline to object is **March 9, 2016**. The Court will hold a hearing in this case on **April 6, 2016 at 10:00 a.m.** to consider whether to approve (1) the Settlement and (2) attorneys’ fees, costs, and expenses, and service awards for the plaintiffs in this case and others who filed cases against SPE relating to the SPE Cyberattack. You may appear at the hearing, but you don’t have to. You will be represented by Class Counsel or you may hire your own attorney at your expense. For a detailed notice with more information about the Settlement, including how to exclude yourself or object, or to see Class Counsel’s fee application when it is filed, go to www.CyberattackSettlement.com or call toll free 1-855-907-3142.

For more information, visit www.CyberattackSettlement.com or call 1-855-907-3142

Your Personal ID number is: [redacted]

Your Claim number is: [redacted]

EXHIBIT B

Corona v. Sony Pictures Entertainment Inc.

C/o CCG

P.O. Box 10246

Dublin, OH 43017-5746

Forwarding Service Requested

1234567890

Personal ID No: MMMMM01111111



Claim No: 1234567890

JANE CLAIMANT
123 4TH AVE
APT 5
SEATTLE, WA 67890

You may have received more than one postcard notification in connection with this Settlement, with one postcard containing an incorrect first name and an incorrect personal identification number. Your information has been corrected on this postcard. Please use the personal identification number on this postcard going forward. Please call 1-855-907-3142 if you have any questions.

You May Be Eligible for Benefits Under a Class Settlement Related to the Sony Pictures Entertainment Cyberattack

For more information, visit www.CyberattackSettlement.com or call (855) 907-3142

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

A Settlement has been proposed in a lawsuit against Sony Pictures Entertainment Inc. (“*Corona v. SPE*”) relating to the cyberattack on SPE in the fall of 2014 (the “SPE Cyberattack”). If you were a current or former corporate or production employee of SPE or one of its subsidiaries as of November 24, 2014, you are a class member. If you were not a current or former corporate or production employee of SPE or one of its subsidiaries as of November 24, 2014, but you received direct notice about this Settlement by mail, SPE has identified you as someone whose Personally Identifiable Information was disclosed on the Internet as a result of the SPE Cyberattack, and you are a class member.

What benefits does the Settlement provide?

AllClear ID Protection Services for Free

SPE will provide class members with certain identity protection services, free of charge, through AllClear ID (“AllClear”).

- **AllClear PRO:** Class members can enroll in AllClear PRO, free of charge, for coverage through December 31, 2017. Enroll at <https://spe.allclearid.com> or by calling AllClear at (855) 731-6013. The deadline to enroll for free is May 23, 2016. If you already enrolled in the AllClear PRO coverage offered by SPE following the SPE Cyberattack, your coverage will be automatically extended, free of charge, through December 31, 2017. Failure to enroll in AllClear PRO may affect your eligibility to make an Identity Theft/Misuse Claim. If you are not sure whether you are already enrolled, please contact AllClear.
- **AllClear Secure:** Class members will also be provided with coverage under AllClear Secure, free of charge, through December 31, 2017. Please note that AllClear PRO provides benefits and services (including credit monitoring and a \$1 million identity protection insurance policy) that are not part of AllClear Secure. You must enroll in AllClear PRO if you want to get those benefits and services.

Cash Payments for Valid Claims

Eligible class members can file claims for payments. To be eligible for a payment you must file a claim and meet certain other requirements. To file a claim, visit www.CyberattackSettlement.com. There are two types of claims:

- You can file a Preventive Measures Claim by no later than **April 23, 2016** if you have incurred actual costs, or spent time, taking measures to avoid Identity Theft/Misuse resulting from the SPE Cyberattack (for example, if you bought credit monitoring services, froze your credit, or obtained credit reports because of the SPE Cyberattack), for which you have not already been reimbursed. Valid claims will be paid from a \$2 million preventive measures fund.
- You can file an Identity Theft/Misuse Claim by no later than **December 31, 2017**, if you have suffered, or do suffer, actual, unreimbursed losses from Identity Theft/Misuse as a direct result of the SPE Cyberattack. Valid claims will be paid as claims are validated and approved, up to an aggregate maximum of \$2.5 million.
- Visit www.CyberattackSettlement.com for more information, including about eligibility and documentation requirements.

How can I get these benefits?

To enroll in AllClear PRO for free, visit <https://spe.allclearid.com> or call AllClear ID at (855) 731-6013. To be eligible for a payment, you must file a valid Claim Form. You can file a Claim Form online at www.CyberattackSettlement.com, or you can file a Claim Form by mail. Visit www.CyberattackSettlement.com for more information, including about eligibility and documentation requirements.

What are my rights?

If you do nothing, you will be bound by the Settlement. If you want to keep the right to sue SPE yourself, you must exclude yourself from the Settlement by **March 9, 2016**. If you stay in the Settlement, you may object to the Settlement or Class Counsel’s fee application. The deadline to object is **March 9, 2016**. The Court will hold a hearing in this case on **April 6, 2016 at 10:00 a.m.** to consider whether to approve (1) the Settlement and (2) attorneys’ fees, expenses, and costs, and service awards for the plaintiffs in this case and others who filed cases against SPE relating to the SPE Cyberattack. You may appear at the hearing, but you don’t have to. You will be represented by Class Counsel or you may hire your own attorney at your expense. For a detailed notice with more information about the Settlement, including how to exclude yourself or object, or to see Class Counsel’s fee application when it is filed, go to www.CyberattackSettlement.com or call toll free (855) 907-3142.

Visit www.CyberattackSettlement.com for more information or call (855) 907-3142

Your Personal ID number is:

11111111

Your Claim number is:

1234567890

EXHIBIT C

~~Comedy Partners Entertainment Inc.~~
c/o GCG
P.O. Box 10246
Dublin, OH 43017-5746

Forwarding Service Requested

You may have previously received a postcard containing an incorrect first name. Your information has been corrected.

the Sony Pictures Entertainment Cyberattack

For more information, visit www.CyberattackSettlement.com or call (855) 907-3142

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- **AllClear Secure:** Class members will also be provided with coverage under AllClear Secure, free of charge, through December 31, 2017. Please note that AllClear PRO provides benefits and services (including credit monitoring and a \$1 million identity protection insurance policy) that are not part of AllClear Secure. You must enroll in AllClear PRO if you want to get those benefits and services.

Cash Payments for Valid Claims

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- You can file a Preventive Measures Claim by no later than **April 23, 2016** if you have incurred actual costs, or spent time, taking measures to avoid Identity Theft/Misuse resulting from the SPE Cyberattack (for example, if you bought credit monitoring services, froze your credit, or obtained credit reports because of the SPE Cyberattack), for which you have not already been reimbursed. Valid claims will be paid from a \$2 million preventive measures fund.
- You can file an Identity Theft/Misuse Claim by no later than **December 31, 2017**, if you have suffered, or do suffer, actual, unreimbursed losses from Identity Theft/Misuse as a direct result of the SPE Cyberattack. Valid claims will be paid as claims are validated and approved, up to an aggregate maximum of \$2.5 million.
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Visit www.CyberattackSettlement.com for more information or call (855) 907-3142

EXHIBIT D

CORONA V. SONY PICTURES ENTERTAINMENT INC.
EXCLUSION REQUESTS

GCG ID NO	CLASS MEMBER NAME
11293718B8	TIINA PIIRSOO
11580F46B6	DAVID TAKAYAMA
117283C78B	JULIANA CANTLEY
119ABA7BA7	JEFFREY KELLY
119CB26B85	DAVE DINARDO
11A035A481	MARK JAMES
11EC38679F	KARIE DINARDO
2220066058	VELIA DEL GRECO
2269004568	JASON COREY DOMBROW