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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CASEY ROBERTS, individually and on
behalf of all other similarly situated,
Plaintiffs,

v.

ZUORA, INC., TIEN TZUO, and TYLER
SLOAT,

Defendants.

No. 3:19-cv-03422-SI

**SUPPLEMENTAL DECLARATION OF
ERIC BLOW REGARDING
DISSEMINATION OF SETTLEMENT
NOTICE PACKETS AND CLAIMS
RECEIVED**

1 I, Eric Blow, declare and state as follows:

2 1. I am a Project Manager employed by Epiq Class Action & Claims Solutions, Inc.
3 (“Epiq”). The following statements are based on my personal knowledge and information
4 provided by other Epiq employees working under my supervision and, if called on to do so, I
5 could and would testify competently thereto.

6 2. Epiq was retained by Class Counsel for the Class in the above-captioned litigation
7 (“Action”), and appointed pursuant to the Court’s August 14, 2023 Order Granting Lead
8 Plaintiffs’ Motion for Preliminary Approval of Class Action Settlement, For Issuance of Notice
9 to the Class, and for Scheduling of Fairness Hearing (ECF 268) (“Preliminary Approval Order”),
10 Epiq was authorized to act as the Claims Administrator in connection with the Settlement
11 reached in the above caption Action.¹ I submit this Supplemental Declaration in order to provide
12 the Court with additional information regarding the mailing of the Court-approved Notice of
13 Pendency and Proposed Settlement of Class Action (the “Settlement Notice”), as well as the
14 Proof of Claim Form and Release Form (the “Claim Form”) (collectively, the Settlement Notice
15 and Claim Form are referred to as the “Settlement Notice Packet”), exclusions or objections
16 received to date, and the Claims received to date.

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18 **DISSEMINATION OF THE SETTLEMENT NOTICE PACKET**

19 3. As described in the Declaration of Eric Blow Regarding: (1) Dissemination of the
20 Settlement Notice Packets; (2) Publication of the Summary Settlement Notice; (3) and
21 Establishment of Telephone Hotline and Settlement Website (ECF 272-5) (“Initial Mailing
22 Declaration”), in accordance with the Preliminary Approval Order, Epiq commenced the mailing
23 of the Settlement Notice Packets to potential Class Members on September 1, 2023.

24 4. As of January 4, 2024, a total of 69,894 Settlement Notice Packets have been
25 disseminated to potential Class Members and Nominees by first-class mail.

26
27 ¹ Unless otherwise defined herein, all capitalized terms have the meanings set forth in the
28 Amended Stipulation and Agreement of Global Settlement dated June 23, 2023 (ECF 248-5)
 (“Stipulation”).

1 in Claims. Claimants will then be given an opportunity to correct their Claims. Accordingly, it
2 is not possible to report valid and invalid Claims at this point of time.

3 **UPDATE ON CALL CENTER AND WEBSITE**

4 10. Epiq continues to maintain the toll-free phone number for this Action, 1-855-914-
5 4696 and interactive voice response system to accommodate any inquiries from potential Class
6 Members. Epiq also continues to maintain the dedicated website for the Action,
7 www.ZuoraSecuritiesLitigation.com (the "Settlement Website"), to assist potential Class
8 Members. Epiq will continue to maintain and, as appropriate, update the Settlement Website and
9 toll-free phone number until the conclusion of the administration.

10 11. Epiq uploaded Lead Plaintiff's final approval motion (ECF No. 270) and Lead
11 Counsel's fee and expense application (ECF No. 271) on the Settlement Website after they were
12 filed on December 8, 2023.

13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is true and correct to the best of my knowledge.

15 Executed on January 5, 2024, in Louisville, Kentucky.

16 
Eric Blow