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**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

AARON WILLIAMS,  
  
Plaintiff,  
  
v.  
  
PILLPACK LLC,  
  
Defendant.

CASE NO. 3:19-cv-05282-DGE  
  
**DECLARATION OF CAMERON R. AZARI,  
ESQ. ON IMPLEMENTATION AND  
ADEQUACY OF CLASS NOTICE PLAN**

I, Cameron R. Azari, Esq., hereby declare and state as follows:

1. My name is Cameron R. Azari, Esq. I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.

2. I am a nationally recognized expert in the field of legal notice, and I have served as an expert in hundreds of federal and state cases involving class action notice program.

3. I am a Senior Vice President of Epiq Class Action & Claims Solutions, Inc. (“Epiq”) and the Managing Director of Epiq Legal Noticing (aka Hilsoft Notifications), a business unit of Epiq that specializes in designing, developing, analyzing, and implementing large-scale, un-biased, legal notification plans. Epiq recently rebranded Hilsoft Notifications as Epiq Legal Noticing. Epiq and Epiq Legal Noticing will hereinafter be referred to as “Epiq.”

4. The facts in this declaration are based on my personal knowledge, as well as information provided to me by my colleagues in the ordinary course of business at Epiq and Epiq Legal Noticing (hereinafter “Epiq”).

1 **OVERVIEW**

2 5. This declaration describes the successful implementation of the Settlement Notice  
3 Plan (“Notice Plan”) for *Williams v. PillPack LLC*, No. 3:19-cv-05282-DGE, pending in the  
4 United States District Court for the Western District of Washington. I previously executed my  
5 *Declaration of Cameron R. Azari, Esq. on Notice Plan* (“Class Certification Notice Plan  
6 Declaration”), on March 9, 2021, in which I detailed Hilsoft’s class action notice experience and  
7 attached Hilsoft’s *curriculum vitae*. I also provided my educational and professional experience  
8 relating to class actions and my ability to render opinions on overall adequacy of notice programs.  
9 Subsequently, I executed my *Supplemental Declaration of Cameron R. Azari, Esq. on Notice Plan*  
10 (“Class Certification Supplemental Notice Plan Declaration”), on October 28, 2021, detailing the  
11 timeline for Implementation of the Class Certification Notice Plan. In addition, I executed my  
12 *Declaration of Cameron R. Azari, Esq. on Notice Plan* (“Class Certification Notice Plan  
13 Declaration Update”), on January 25, 2023, describing Epiq’s Notice Plan and reaffirming Epiq’s  
14 experience and qualifications relating to class actions. Furthermore, I executed my *Supplemental*  
15 *Declaration of Cameron R. Azari, Esq. on Notice Plan* (“Class Certification Supplemental Notice  
16 Plan Declaration Update”), on February 17, 2023, detailing additional information regarding the  
17 planned implementation of the Notice Plan.

18 6. Epiq designed this Notice Plan based on our extensive prior experience and  
19 research into the notice issues particular to this Settlement. The Notice Plan as designed and  
20 implemented was the best method practicable under the circumstances to provide notice to the  
21 Settlement Class Members.

22 **DATA PRIVACY AND SECURITY**

23 7. Epiq has procedures in place to protect the security of data for the Settlement Class.  
24 As with all cases, Epiq maintains extensive data security and privacy safeguards in its official  
25 capacity as the Settlement Administrator for this Action. A Service Agreement, which formally  
26 retains Epiq as the Settlement Administrator, governs Epiq’s Settlement Administration  
27 responsibilities for the Action. Epiq maintains adequate insurance in case of errors.

1           8.       As a data processor, Epiq performs services on data provided, only as those outlined  
2 in a contract and/or associated statement(s) of work. Epiq does not utilize or perform other  
3 procedures on personal data provided or obtained as part of its services to a client. For this Action,  
4 Class Member data was provided directly to Epiq. Epiq does not use such information or  
5 information provided by Settlement Class Members for any other purpose than the administration  
6 of this Action, specifically the information is not used, disseminated, or disclosed by or to any  
7 other person for any other purpose.

8           9.       The security and privacy of clients' and class members' information and data are  
9 paramount to Epiq. That is why Epiq has invested in a layered and robust set of trusted security  
10 personnel, controls, and technology to protect the data we handle. To promote a secure  
11 environment for client and class member data, industry leading firewalls and intrusion prevention  
12 systems protect and monitor Epiq's network perimeter with regular vulnerability scans and  
13 penetration tests. Epiq deploys best-in-class endpoint detection, response, and anti-virus solutions  
14 on our endpoints and servers. Strong authentication mechanisms and multi-factor authentication  
15 are required for access to Epiq's systems and the data we protect. In addition, Epiq has employed  
16 the use of behavior and signature-based analytics as well as monitoring tools across our entire  
17 network, which are managed 24 hours per day, 7 days per week, by a team of experienced  
18 professionals.

19           10.      Epiq's world class data centers are defended by multi-layered, physical access  
20 security, including formal ID and prior approval before access is granted, closed-circuit  
21 television ("CCTV"), alarms, biometric devices, and security guards, 24 hours per day, 7 days per  
22 week. Epiq manages minimum Tier 3+ data centers in 18 locations worldwide. Our centers have  
23 robust environmental controls including uninterruptable power supply ("UPS"), fire detection and  
24 suppression controls, flood protection, and cooling systems.

25           11.      Beyond Epiq's technology, our people play a vital role in protecting class members'  
26 and our clients' information. Epiq has a dedicated information security team comprised of highly  
27 trained, experienced, and qualified security professionals. Our teams stay on top of important  
28

1 security issues and retain important industry standard certifications, like SysAdmin, Audit,  
2 Network, and Security (“SANS”), Certified Information Systems Security Professional (“CISSP”),  
3 and Certified Information Systems Auditor (“CISA”). Epiq is continually improving security  
4 infrastructure and processes based on an ever-changing digital landscape. Epiq also partners with  
5 best-in-class security service providers. Our robust policies and processes cover all aspects of  
6 information security to form part of an industry leading security and compliance program, which  
7 is regularly assessed by independent third parties.

8       12. Epiq holds several industry certifications including: Trusted Information Security  
9 Assessment Exchange (“TISAX”), Cyber Essentials, Privacy Shield, and ISO 27001. In addition  
10 to retaining these certifications, we are aligned to Health Insurance Portability and Accountability  
11 Act (“HIPAA”), National Institute of Standards and Technology (“NIST”), and Federal  
12 Information Security Management Act (“FISMA”) frameworks. Epiq follows local, national, and  
13 international privacy regulations. To support our business and staff, Epiq has a dedicated team to  
14 facilitate and monitor compliance with privacy policies. Epiq is also committed to a culture of  
15 security mindfulness. All employees routinely undergo cybersecurity trainings to ensure that  
16 safeguarding information and cybersecurity vigilance is a core practice in all aspects of the work  
17 our teams complete.

18       13. Upon completion of a project, Epiq continues to host all data until otherwise  
19 instructed in writing by a customer to delete, archive or return such data. When a customer  
20 requests that Epiq delete or destroy all data, Epiq agrees to delete or destroy all such data; provided,  
21 however, that Epiq may retain data as required by applicable law, rule or regulation, and to the  
22 extent such copies are electronically stored in accordance with Epiq’s record retention or back-up  
23 policies or procedures (including those regarding electronic communications) then in effect. Epiq  
24 keeps data in line with client retention requirements. If no retention period is specified, Epiq  
25 returns the data to the client or securely deletes it as appropriate.

1 **NOTICE PLAN METHODOLOGY**

2 14. Federal Rule of Civil Procedure, Rule 23 directs that notice must be “the best notice  
3 that is practicable under the circumstances, including individual notice to all members who can be  
4 identified through reasonable effort. The notice may be by one or more of the following: United  
5 States mail, electronic means, or other appropriate means.”<sup>1</sup> The Notice Plan as implemented  
6 satisfied these requirements.

7 15. The Notice Plan as approved by the Court and implemented reached the greatest  
8 practicable number of Settlement Class Members. The Notice Plan’s individual notice efforts via  
9 email and/or mail reached approximately 98.4% of the potential Settlement Class Members who  
10 were sent notice. The reach was further enhanced by supplemental media – digital and social  
11 media, an informational release, and a Settlement Website. In my experience, the reach of the  
12 Notice Plan was consistent with other court-approved notice plans, was the best notice practicable  
13 under the circumstances of this case, and satisfied the requirements of due process, including its  
14 “desire to actually inform” requirement.<sup>2</sup>

15 **CAFA NOTICE**

16 16. On August 30, 2024, Epiq sent 68 CAFA Notice Packages (“CAFA Notice”). The  
17 CAFA Notice was mailed via United States Postal Service (“USPS”) Priority Mail to 56 officials  
18 (Attorneys General of 50 states, District of Columbia, and United States Territories). The  
19 Attorneys General offices for the states of California, Louisiana, Minnesota, North Carolina, New  
20 Mexico, New York, Tennessee, Utah, and Washington each received two CAFA Notices via USPS  
21 to account for multiple addresses. The Offices of the Nevada and Connecticut Attorneys General  
22 also received the CAFA Notice electronically via email. In addition, the CAFA Notice was sent  
23

24 <sup>1</sup> Fed. R. Civ. P. 23(c)(2)(B).

25 <sup>2</sup> *Mullane v. Cent. Hanover Bank & Trust Co.*, 339 U.S. 306, 315 (1950) (“But when notice is a  
26 person’s due, process which is a mere gesture is not due process. The means employed must be such  
27 as one desirous of actually informing the absentee might reasonably adopt to accomplish it. The  
28 reasonableness and hence the constitutional validity of any chosen method may be defended on the  
ground that it is in itself reasonably certain to inform those affected . . .”).

1 via United Parcel Service (“UPS”) to the Attorney General of the United States. Details regarding  
2 the CAFA Notice mailing are provided in the *Declaration of Kyle S. Bingham on Implementation*  
3 *of CAFA Notice*, dated August 30, 2024, which is included as **Attachment 1**.

4 **NOTICE PLAN DETAIL**

5 17. On December 23, 2022, the Court certified the class in the *Order Granting in Part*  
6 *Plaintiff’s Motion for Clas Certification*, as follows:

7 All persons or entities within the United States who between March 13,  
8 2018, and June 16, 2019, received a non-emergency telephone call  
9 promoting goods and services on behalf of PillPack LLC as part of the  
10 PillPack Performance Media Campaign:

11 (i) to a cellular telephone number through the use of an artificial or  
12 prerecorded voice; and (ii) Performance Media or its agents live transferred  
13 the call to a PillPack call center on the DNIS 866-298-0058; and (iii)  
14 Performance Media or its agents did not obtain the cellular telephone  
15 number through Rewardzoneusa.com, Nationalconsumercenter.com,  
16 finddreamjobs.com, instantplaysweepstakes.com, startacareertoday.com,  
17 samplesandsavings.com, sweepstakesaday.com, Surveyvoices.com, or  
18 Financedoneright.com between June 19, 2017, and May 3, 2019, before  
19 the date(s) of the call(s).

20 18. Subsequently, on September 17, 2024, the Court approved the Notice Plan and  
21 appointed Epiq as the Settlement Administrator in the *Order on Preliminary Approval of Class*  
22 *Action Settlement* (“Preliminary Approval Order”). After the Court’s Preliminary Approval Order  
23 was entered, Epiq implemented the Notice Plan approved by the Court. This declaration details  
24 the notice activities undertaken to date and explains how and why the Notice Plan was  
25 comprehensive and well-suited to reach the Settlement Class. This declaration also discusses the  
26 administration activity to date.

27 **NOTICE PLAN**

28 ***Individual Notice***

19. On August 26, 2024, Epiq received one data file with 30,271 records for identified  
Settlement Class Members, containing a list of cellular telephone numbers. Subsequently, on  
September 19, 2024, and October 14, 2024, Epiq received two additional data files that included  
contact information for potential Settlement Class Members. The telephone numbers from the

1 first file were compared with the two additional files to find matches to create the Settlement Class  
2 Member records. For any telephone numbers that did not match with the files containing the  
3 contact information, Epiq compared the data against the database used for the case to provide  
4 Notice during the Class Certification phase of the case to create additional records. Epiq then  
5 conducted third-party reverse look-up, skip traces on telephone numbers that did not match with  
6 any record in the multiple data files. Epiq deduplicated and rolled-up the records and loaded the  
7 unique, potential Settlement Class Member records into its database for this Settlement. These  
8 efforts resulted in 52,264 unique, potential Settlement Class Member records<sup>3</sup> (of these records,  
9 8,306 records had invalid contact information and were not sent notice). An Email Notice was  
10 sent to all potential Settlement Class Members for whom a valid email address was available, and  
11 a double Postcard Notice with detachable Claim Form (“Postcard Notice”) was sent via USPS first  
12 class mail to all potential Settlement Class Members for whom a mailing address was available  
13 and a valid Email Notice was not available.

14 ***Individual Notice - Email***

15 20. Commencing on November 21, 2024, Epiq sent 14,833 Email Notices to potential  
16 Settlement Class Members for whom a valid email address was available (some potential  
17 Settlement Class Members had multiple valid email addresses and were sent an Email Notice to  
18 each valid email address). The following industry standard best practices were followed for the  
19 Email Notice efforts. The Email Notice contained the substantive information approved by the  
20 Court, and was drafted in such a way that the subject line, the sender, and the body of the message  
21 overcame SPAM filters and ensured readership to the fullest extent reasonably practicable. For  
22 instance, the Email Notices used an embedded html text format. This format provided easy-to-  
23 read text without graphics, tables, images and other elements that in our experience would have  
24 increased the likelihood that the message would have been blocked by Internet Service Providers

25 \_\_\_\_\_  
26 <sup>3</sup> For some telephone numbers on the settlement class list, there were more than one name  
27 associated with a telephone number. As a result, the settlement notice was therefore sent to all  
28 potential Settlement Class Members associated with a single telephone number on the list.



1 (ISPs) and/or SPAM filters for this type of communication. The Email Notices were sent from an  
2 IP address known to major email providers as one not used to send bulk “SPAM” or “junk” email  
3 blasts. Each Email Notice was transmitted with a digital signature to the header and content of the  
4 Email Notice, which allowed ISPs to programmatically authenticate that the Email Notices were  
5 from our authorized mail servers. Each Email Notice was also transmitted with a unique message  
6 identifier. The Email Notices included an embedded link to the Settlement Website. By clicking  
7 the link, recipients were able to access the Long Form Notice and additional information about the  
8 Settlement. The Email Notice is included as **Attachment 2**.

9 21. If the receiving email server could not deliver the message, a “bounce code” was  
10 returned along with the unique message identifier. For any Email Notice for which a bounce code  
11 was received indicating that the message was undeliverable for reasons such as an inactive or  
12 disabled account, the recipient’s mailbox was full, technical autoreplies, etc., at least two  
13 additional attempts were made to deliver the Notice by email.

14 ***Individual Notice - Direct Mail***

15 22. Commencing on November 21, 2024, Epiq sent 29,385 Postcard Notices to all  
16 potential Settlement Class Members for whom a mailing address was available, and a valid email  
17 address was not available. The Postcard Notice was sent via USPS first class mail. The Postcard  
18 Notice directed the recipients to the Settlement Website where they could access the Long Form  
19 Notice and additional information about the Settlement. The Postcard Notice is included as  
20 **Attachment 3**.

21 23. Prior to sending the Postcard Notices, all mailing addresses were checked against  
22 the National Change of Address (“NCOA”) database maintained by the USPS to ensure Settlement  
23 Class Member address information was up-to-date and accurately formatted for mailing.<sup>4</sup> In

24 \_\_\_\_\_  
25 <sup>4</sup> The NCOA database is maintained by the USPS and consists of approximately 160 million  
26 permanent change-of-address (“COA”) records consisting of names and addresses of individuals,  
27 families, and businesses who have filed a change-of-address with the Postal Service™. The  
28 address information is maintained on the database for 48 months and reduces undeliverable mail  
by providing the most current address information, including standardized and delivery point  
coded addresses, for matches made to the NCOA file for individual, family, and business moves.



1 addition, the addresses were certified via the Coding Accuracy Support System (“CASS”) to  
2 ensure the quality of the zip code, and was verified through Delivery Point Validation (“DPV”) to  
3 verify the accuracy of the addresses. This address updating process is standard for the industry  
4 and for the majority of promotional mailings that occur today.

5 24. The return address on the Postcard Notices is a post office box that Epiq maintains  
6 for this Action. The USPS automatically forwarded Postcard Notices with an available forwarding  
7 address order that had not expired (“Postal Forwards”). Postcard Notices returned as undeliverable  
8 were re-mailed to any new address available through USPS information, (for example, to the  
9 address provided by the USPS on returned mail pieces for which the automatic forwarding order  
10 had expired, but was still within the time period in which the USPS returned the piece with the  
11 address indicated), and to better addresses that were found using a third-party address lookup  
12 service. Upon successfully locating better addresses, Postcard Notices were promptly remailed.

13 25. Additionally, a Long Form Notice and Claim Form (“Claim Package”) was mailed  
14 to all persons who requested one via the toll-free telephone number or other means. As of March  
15 26, 2025, Epiq has mailed 151 Claim Packages as a result of such requests. The Long Form Notice  
16 is included as **Attachment 4**. The Claim Form is included as **Attachment 5**.

#### 17 *Notice Results*

18 26. As of March 26, 2025, an Email Notice and/or Postcard Notice was delivered to  
19 51,450 of the 52,264 unique, potential Settlement Class Members who were sent notice. This  
20 means the individual notice efforts reached approximately 98.4% of the potential Settlement Class  
21 Members who were sent notice.

#### 22 *Media Plan*

#### 23 *Internet Digital Notice Campaign*

24 27. Internet advertising has become a standard component in legal notice programs.  
25 The internet has proven to be an efficient and cost-effective method to target class members as  
26  
27  
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1 part of providing notice of a class action settlement. According to MRI-Simmons<sup>5</sup> data, 97% of  
2 all adults are online and 84% of all adults use social media.<sup>6</sup>

3 28. The Notice Plan included targeted digital advertising (“Digital Notices”) on the  
4 selected advertising network *Google Display Network*, which represents thousands of digital  
5 properties across all major content categories. Digital Notices were targeted to selected target  
6 audiences and were designed to encourage participation by Settlement Class Members—by linking  
7 directly to the Settlement Website, allowing visitors easy access to relevant information and  
8 documents. Consistent with best practices, the Digital Notices used language from the headline of  
9 the Notice, which allowed users to identify themselves as potential Settlement Class Members.

10 29. The Digital Notices were also placed on *Facebook* and *Instagram*.

11 30. All Digital Notices appeared on mobile and tablet devices. To reach Settlement  
12 Class Members, *Google Display Network*, *Facebook*, and *Instagram* Digital Notices were  
13 displayed nationwide. Digital Notices were also targeted (remarketed) to people who click on a  
14 Digital Notice.

15 31. More details regarding the target audiences, specific ad sizes of the Digital Banner  
16 Notices, and the number of delivered impressions are included in the following table.

<i>Network/Property</i>	<i>Distribution</i>	<i>Ad Size</i>	<i>Delivered Impressions</i>
<i>Google Display Network</i>	National	728x90, 300x250 & 300x50	4,363,403
<i>Facebook</i>	National	Newsfeed	3,539,075

21  
22 <sup>5</sup> MRI-Simmons is a leading source of publication readership and product usage data for the  
23 communications industry. MRI-Simmons is a joint venture of GfK Mediamark Research &  
24 Intelligence, LLC (“MRI”) and Simmons Market Research. MRI-Simmons offers comprehensive  
25 demographic, lifestyle, product usage and exposure to all forms of advertising media collected from  
26 a single sample. As the leading U.S. supplier of multimedia audience research, the company  
27 provides information to magazines, televisions, radio, internet, and other media, leading national  
28 advertisers, and over 450 advertising agencies—including 90 of the top 100 in the United  
States. MRI-Simmons’s national syndicated data is widely used by companies as the basis for the  
majority of the media and marketing plans that are written for advertised brands in the United States.

<sup>6</sup> MRI-Simmons 2024 Survey of the American Consumer®.

<i>Network/Property</i>	<i>Distribution</i>	<i>Ad Size</i>	<i>Delivered Impressions</i>
<i>Instagram</i>	National	Newsfeed	1,619,054
<b>Total</b>			<b>9,521,532</b>

32. Combined, approximately 9.5 million impressions were generated by the Digital Notices.<sup>7</sup> The Digital Notices ran from November 24, 2024, through December 20, 2024. Clicking on the Digital Notices linked the readers to the Settlement Website, where they could easily obtain detailed information about the Settlement. Examples of the Digital Notices are included as **Attachment 6**.

#### *Informational Release*

33. To build additional reach and extend exposures, on November 21, 2024, a party-neutral Informational Release was issued broadly over PR Newswire, to approximately 13,000 general media (print and broadcast) outlets, including local and national newspapers, magazines, national wire services, television, and radio broadcast media across the United States, as well as approximately 4,000 websites, online databases, internet networks, and social networking media.

34. The Informational Release included the address of the Settlement Website and the toll-free telephone number. The Informational Release served a valuable role by providing additional notice exposures beyond that which was provided by the paid media. The Informational Release is included as **Attachment 7**.

#### *Settlement Website*

35. The existing informational website that was established for the class certification notice efforts ([www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com)) was updated with additional information regarding the Settlement. Relevant documents are posted on the Settlement Website, including the Long Form Notice, Settlement Agreement, Complaint, Preliminary Approval Order, Plaintiff's

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<sup>7</sup> The third-party ad management platform, ClickCease, was used to audit Digital Notice ad placements. This type of platform tracks all Digital Notice ad clicks to provide real-time ad monitoring, fraud traffic analysis, blocks clicks from fraudulent sources, and quarantines dangerous IP addresses. This helps reduce wasted, fraudulent or otherwise invalid traffic (e.g., ads being seen by 'bots' or non-humans, ads not being viewable, etc.).

1 Motion for Attorneys' Fees, Costs, and Service Award, and other case-related documents. In  
2 addition, the Settlement Website includes relevant dates, answers to frequently asked questions  
3 ("FAQs"), instructions for how Settlement Class Members could opt-out (request exclusion) from  
4 or object to the Settlement prior to the deadlines, contact information for the Settlement  
5 Administrator, and how to obtain other case-related information. Settlement Class Members were  
6 also able to file a Claim Form on the Settlement Website prior to the deadline. The Settlement  
7 Website address was prominently displayed in all notice documents. As of March 26, 2025, there  
8 have been 78,427 unique visitor sessions to the Settlement Website, and 288,584 web pages have  
9 been presented.

#### 10 ***Toll-Free Telephone Number***

11 36. The existing toll-free telephone number (1-855-654-0837) that was established for the  
12 class certification notice efforts was updated with additional information regarding the Settlement.  
13 Callers can hear an introductory message, have the option to learn more about the Settlement in the  
14 form of recorded answers to FAQs, and request that a Claim Package be mailed to them. In addition,  
15 callers can request to speak to a lawyer with Class Counsel regarding the Settlement. The automated  
16 telephone system is available 24 hours per day, 7 days per week. The toll-free telephone number was  
17 prominently displayed in all notice documents. As of March 26, 2025, there have been 2,605 calls to  
18 the toll-free telephone number representing 6,269 minutes of use.

19 37. A postal mailing address and email address for the Settlement Administrator was  
20 established and continues to be available, allowing Settlement Class Members the opportunity to  
21 request additional information or ask questions.

#### 22 ***Requests for Exclusion and Objections***

23 38. The deadline to request exclusion from the Settlement or to object to the Settlement  
24 was January 20, 2025. As of March 26, 2025, Epiq has not received any requests for exclusion.  
25 As of March 26, 2025, Epiq is aware of no objections to the Settlement.

1 *Claim Filing & Distribution Options*

2 39. The Notices provided a detailed summary of the relevant information about the  
3 Settlement, including the Settlement Website address and how Settlement Class Members could  
4 submit a Claim Form online or by mail prior to the Claims Deadline. With any method of  
5 submitting a Claim Form, Settlement Class Members were given the option of receiving a digital  
6 payment or a traditional paper check.

7 40. The deadline for Settlement Class Members to file a Claim Form was January  
8 20, 2025. As of March 26, 2025, Epiq has received 18,486 Claim Forms. Of these Claim  
9 Forms, 18,165 were timely and 321 were late. Of the 18,486 Claims Form, 10,768 have been  
10 verified and approved to date. The remaining Claim Forms are currently being processed by  
11 Epiq. It is my understanding from Class Counsel that a request has been made of the Court to  
12 approve Claim Forms that are valid, but were submitted late on or before March 18, 2025. The  
13 total number of these Claim Forms is 124. As standard practice, Epiq is in the process of  
14 conducting a complete review of the Claim Forms received. There is a likelihood that after  
15 detailed review, the total number of Claim Forms received will change due to duplicate and  
16 denied Claim Forms.

17 41. On March 11, 2025, Epiq sent Deficiency Letters to 7,356 claimants whose timely  
18 Claim Form have some type of deficiency. Deficiencies include, an unsigned Claim Form, the  
19 telephone number submitted is not in the call records, or where multiple people claimed ownership  
20 of the same telephone number (in the call records).

21 42. As of March 26, 2025, Epiq has received 570 responses from claimants to the  
22 Deficiency Letters, of which 82 have been fully processed, resulting in 27 deficient Claim Forms  
23 being successfully cured of deficiencies. Epiq is currently processing these responses and  
24 anticipates receiving additional responses since the deadline to cure a deficient Claim Form is a  
25 postmarked deadline.

1 *Reminder Notice*

2 43. Commencing on December 20, 2025, Epiq sent 10,249 Reminder Email Notices  
3 and 41,592<sup>8</sup> Reminder Postcard Notices and commencing on January 6, 2025, Epiq sent a second  
4 round of reminder notices, sending 9,291 Reminder Email Notices and 38,503 Reminder Postcard  
5 Notices. The Reminder Email Notices and Reminder Postcard Notices were sent to Settlement  
6 Class Members for whom a valid email address and/or physical address was available that was not  
7 previously returned as undeliverable, and who had not yet filed a Claim Form. The Reminder  
8 Email Notice is included as **Attachment 8**. The Reminder Postcard Notice is included as  
9 **Attachment 9**.

10 CONCLUSION

11 44. In class action notice planning, execution, and analysis, we are guided by due  
12 process considerations under the United States Constitution, by federal and local rules and statutes,  
13 and further by case law pertaining to notice. This framework directs that the notice program be  
14 designed to reach the greatest practicable number of potential class members and, in a settlement  
15 class action notice situation such as this, that the notice or notice program itself not limit  
16 knowledge of the availability of benefits—nor the ability to exercise other options—to class  
17 members in any way. All of these requirements were met in this case.

18 45. The Notice Plan included individual notice via email and/or mail to the potential  
19 Settlement Class Members. With the address updating protocols that were used, the Notice Plan  
20 individual notice efforts reached approximately 98.4% of the potential Settlement Class Members  
21 who were sent notice. The reach was further enhanced by supplemental media – digital and social  
22 media, an informational release, and a Settlement Website. The FJC’s Judges’ Class Action Notice  
23 and Claims Process Checklist and Plain Language Guide, which is relied upon for federal cases,  
24 states that, “the lynchpin in an objective determination of the adequacy of a proposed notice effort  
25 is whether all the notice efforts together will reach a high percentage of the class. It is reasonable

26 \_\_\_\_\_  
27 <sup>8</sup> All Settlement Class Member records with an available mailing address were sent a Postcard Notice even  
28 if they had a valid email address.

1 to reach between 70–95%.”<sup>9</sup> Here, we have developed and implemented a Notice Plan that readily  
2 achieved a reach within that standard.

3 46. The Notice Plan followed the guidance for satisfying due process obligations that  
4 a notice expert gleans from the United States Supreme Court’s seminal decisions, which emphasize  
5 the need: (a) to endeavor to actually inform the Settlement Class, and (b) to ensure that notice is  
6 reasonably calculated to do so.


7 a) “[W]hen notice is a person’s due, process which is a mere gesture is not due  
8 process. The means employed must be such as one desirous of actually informing  
9 the absentee might reasonably adopt to accomplish it,” *Mullane v. Central Hanover*  
*Trust*, 339 U.S. 306, 315 (1950); and

10 b) “[N]otice must be reasonably calculated, under all the circumstances, to apprise  
11 interested parties of the pendency of the action and afford them an opportunity to  
12 present their objections,” *Eisen v. Carlisle & Jacquelin*, 417 U.S. 156 (1974) (citing  
*Mullane*, 339 U.S. at 314).

13 47. The Notice Plan provided the best notice practicable under the circumstances,  
14 conformed to all aspects of Federal Rule of Civil Procedure 23 regarding notice, comported with  
15 the guidance for effective notice articulated in the Manual for Complex Litigation, Fourth and  
16 applicable FJC materials, and satisfied the requirements of due process, including its “desire to  
17 actually inform” requirement.

18 48. The Notice Plan schedule afforded enough time to provide full and proper notice to  
19 Settlement Class Members before any Opt-Out and Objection deadlines.

20 I declare under penalty of perjury that the foregoing is true and correct. Executed March  
21 27, 2025.

22  
23   
24 \_\_\_\_\_  
Cameron R. Azari, Esq.

25  
26 <sup>9</sup> FED. JUDICIAL CTR, JUDGES’ CLASS ACTION NOTICE AND CLAIMS PROCESS CHECKLIST AND PLAIN  
27 LANGUAGE GUIDE 3 (2010), available at <https://www.fjc.gov/content/judges-class-action-notice-and-claims-process-checklist-and-plain-language-guide-0>.



# Attachment 1

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

AARON WILLIAMS, on behalf of himself and all  
others similarly situated,

Case No. 3:19-cv-05282-DGE

Plaintiff,

vs.

PILLPACK LLC,

Defendant.

**DECLARATION OF KYLE S. BINGHAM ON IMPLEMENTATION OF CAFA NOTICE**

I, KYLE S. BINGHAM, hereby declare and state as follows:

1. My name is KYLE S. BINGHAM. I am over the age of 25 and I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.

2. I am the Senior Director of Legal Noticing for Epiq Class Action & Claims Solutions, Inc. (“Epiq”), a firm that specializes in designing, developing, analyzing and implementing large-scale, unbiased, legal notification plans. I have overseen and handled Class Action Fairness Act (“CAFA”) notice mailings for more than 500 class action settlements.

3. Epiq is a firm with more than 25 years of experience in claims processing and settlement administration. Epiq’s class action case administration services include coordination of all notice requirements, design of direct-mail notices, establishment of fulfillment services, receipt and processing of opt-outs, coordination with the United States Postal Service (“USPS”), claims database management, claim adjudication, funds management and distribution services.

4. The facts in this Declaration are based on what I personally know, as well as information provided to me in the ordinary course of my business by my colleagues at Epiq.

**CAFA NOTICE IMPLEMENTATION**

1  
2 5. At the direction of counsel for Defendant PillPack LLC, 57 federal and state officials  
3 (the Attorney General of the United States and the Attorneys General of each of the 50 states, the District  
4 of Columbia, and the United States Territories) were identified to receive CAFA notice.

5 6. Epiq maintains a list of these federal and state officials with contact information for the  
6 purpose of providing CAFA notice. Prior to mailing, the names and addresses selected from Epiq’s list  
7 were verified, then run through the Coding Accuracy Support System (“CASS”) maintained by the  
8 United States Postal Service (“USPS”).<sup>1</sup>  
9

10 7. On August 30, 2024, Epiq sent 68 CAFA Notice Packages (“Notice”). The Notice was  
11 mailed via USPS Priority Mail to 56 officials (the Attorneys General of 50 states, the District of  
12 Columbia, and the United States Territories). The Attorneys General offices for the states of California,  
13 Louisiana, Minnesota, North Carolina, New Mexico, New York, Tennessee, Utah, and Washington each  
14 received two Notices via USPS to account for multiple addresses. The Office of the Nevada and  
15 Connecticut Attorneys General also received the Notice electronically via email. The Notice was also  
16 sent via United Parcel Service (“UPS”) to the Attorney General of the United States. The CAFA Notice  
17 Service List (USPS Priority Mail, Email, and UPS) is included as **Attachment 1**.

18 8. The materials sent to the federal and state officials included a Cover Letter, which  
19 provided notice of the proposed Settlement of the above-captioned case. The Cover Letter is included  
20 as **Attachment 2**.  
21

22 9. The cover letter was accompanied by a CD, which included the following:


- 23 a. **Per 28 U.S.C. § 1715(b)(1) – Complaint and Any Amended Complaints:**  
24 Copies of the complaint and amended complaint.

25  
26 <sup>1</sup> CASS improves the accuracy of carrier route, 5-digit ZIP®, ZIP + 4® and delivery point codes  
27 that appear on mail pieces. The USPS makes this system available to mailing firms who want to  
28 improve the accuracy of postal codes, i.e., 5-digit ZIP®, ZIP + 4®, delivery point (DPCs), and carrier  
route codes that appear on mail pieces.

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- b. **Per 28 U.S.C. § 1715(b)(3) – Notification to Class Members:** A copy of the notice to be provided to the class was included as exhibits to the *Settlement Agreement and Release of Claims*.
- c. **Per 28 U.S.C. § 1715(b)(4) – Class Action Settlement Agreement:** A copy of the proposed *Settlement Agreement and Release of Claims*.
- d. **Per 28 U.S.C. § 1715(b)(7) – Estimate of Class Members:** The estimated number of class members residing in each state and estimated proportionate share of the claims of such members to the entire settlement.
- e. **Other Material:** A copy of (a) *Plaintiff's Unopposed Motion for Preliminary Approval* and (b) *Declaration of Blythe H. Chandler in Support of Plaintiff's Unopposed Motion for Preliminary Approval*.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 30, 2024.

  
\_\_\_\_\_  
Kyle S. Bingham

# **Attachment 1**

## CAFA Notice Service List

## USPS Priority Mail

Appropriate Official	FullName	Address1	Address2	City	State	Zip
Office of the Attorney General	Treg Taylor	1031 W 4th Ave	Suite 200	Anchorage	AK	99501
Office of the Attorney General	Steve Marshall	501 Washington Ave	PO Box 300152	Montgomery	AL	36130
Office of the Attorney General	Tim Griffin	323 Center St	Suite 200	Little Rock	AR	72201
Office of the Attorney General	Kris Mayes	2005 N Central Ave		Phoenix	AZ	85004
Office of the Attorney General	CAFA Coordinator	Consumer Protection Section	455 Golden Gate Ave Suite 11000	San Francisco	CA	94102
Office of the Attorney General	Rob Bonta	1300 I St		Sacramento	CA	95814
Office of the Attorney General	Phil Weiser	Ralph L Carr Colorado Judicial Center	1300 Broadway Fl 10	Denver	CO	80203
Office of the Attorney General for Connecticut	William Tong	165 Capitol Avenue		Hanford	CT	06106
Office of the Attorney General	Brian Schwalb	400 6th St NW		Washington	DC	20001
Office of the Attorney General	Kathy Jennings	Carvel State Bldg	820 N French St	Wilmington	DE	19801
Office of the Attorney General	Ashley Moody	State of Florida	The Capitol PL-01	Tallahassee	FL	32399
Office of the Attorney General	Chris Carr	40 Capitol Square SW		Atlanta	GA	30334
Department of the Attorney General	Anne E Lopez	425 Queen St		Honolulu	HI	96813
Iowa Attorney General	Brenna Bird	Hoover State Office Building	1305 E Walnut St	Des Moines	IA	50319
Office of the Attorney General	Raul Labrador	700 W Jefferson St Ste 210	PO Box 83720	Boise	ID	83720
Office of the Attorney General	Kwame Raoul	100 W Randolph St		Chicago	IL	60601
Office of the Indiana Attorney General	Todd Rokita	Indiana Government Center South	302 W Washington St Rm 5	Indianapolis	IN	46204
Office of the Attorney General	Kris Kobach	120 SW 10th Ave 2nd Fl		Topeka	KS	66612
Office of the Attorney General	Russell Coleman	700 Capitol Ave Suite 118		Frankfort	KY	40601
Office of the Attorney General	Liz Murrill	PO Box 94005		Baton Rouge	LA	70804
Office of the Attorney General	Liz Murrill	1885 North Third Street		Baton Rouge	LA	70802
Office of the Attorney General	Andrea Campbell	1 Ashburton Pl 20th Fl		Boston	MA	02108
Office of the Attorney General	Anthony G Brown	200 St Paul Pl		Baltimore	MD	21202
Office of the Attorney General	Aaron Frey	6 State House Station		Augusta	ME	04333
Department of Attorney General	Dana Nessel	PO BOX 30212	525 W. Ottawa St.	Lansing	MI	48909
Office of the Attorney General	Keith Ellison	445 Minnesota St Ste 1400		St Paul	MN	55101
Office of the Attorney General	Keith Ellison	75 Dr. Martin Luther King Jr Blvd	Suite 102 State Capital	St. Paul	MN	55155
Missouri Attorney General's Office	Andrew Bailey	207 West High Street	PO Box 899	Jefferson City	MO	65102
Mississippi Attorney General	Lynn Filch	PO Box 220		Jackson	MS	39205
Office of the Attorney General	Austin Knudsen	215 N Sanders 3rd Fl	PO Box 201401	Helena	MT	59620
Attorney General's Office	Josh Stein	9001 Mail Service Ctr		Raleigh	NC	27699
Department of Justice	Josh Stein	PO Box 629		Raleigh	NC	27602
Office of the Attorney General	Drew H Wrigley	600 E Boulevard Ave Dept 125		Bismarck	ND	58505
Nebraska Attorney General	Mike Hilgers	2115 State Capitol	PO Box 98920	Lincoln	NE	68509
Office of the Attorney General	John Formella	NH Department of Justice	33 Capitol St	Concord	NH	03301
Office of the Attorney General	Matthew J Platkin	25 Market Street	PO Box 080	Trenton	NJ	08625
Office of the Attorney General	Raul Torrez	408 Galisteo St	Villagra Bldg	Santa Fe	NM	87501
Office of the Attorney General	Raul Torrez	PO Box Drawer 1508		Santa Fe	NM	87504
Office of the Attorney General for Nevada	Aaron D. Ford	Old Supreme Ct Bldg	100 N. Carson St.	Carson City	NV	89701
Office of the Attorney General	CAFA Coordinator	28 Liberty Street 15th Floor		New York	NY	10005
Office of the Attorney General	Letitia A. James	Dept of Law - The Capitol	2nd Floor	Albany	NY	12224
Office of the Attorney General	Dave Yost	30 E Broad St Fl 14		Columbus	OH	43215
Office of the Attorney General	Gentner Drummond	313 NE 21st St		Oklahoma City	OK	73105
Office of the Attorney General	Ellen F Rosenblum	Oregon Department of Justice	1162 Court St NE	Salem	OR	97301
Office of the Attorney General	Michelle A Henry	16th Fl Strawberry Square		Harrisburg	PA	17120
Office of the Attorney General	Peter F Neronha	150 S Main St		Providence	RI	02903
Office of the Attorney General	Alan Wilson	PO Box 11549		Columbia	SC	29211
Office of the Attorney General	Marty Jackley	1302 E Hwy 14 Ste 1		Pierre	SD	57501
Office of the Attorney General	Jonathan Skrmetti	PO Box 20207		Nashville	TN	37202
Office of the Attorney General	Jonathan Skrmetti	425 5th Avenue North		Nashville	TN	37243
Office of the Attorney General	Ken Paxton	PO Box 12548		Austin	TX	78711
Office of the Attorney General	Sean D Reyes	PO Box 142320		Salt Lake City	UT	84114
Office of the Attorney General	Sean D Reyes	State Capitol	Room 236	Salt Lake City	UT	84114
Office of the Attorney General	Jason S Miyares	202 N 9th St		Richmond	VA	23219
Office of the Attorney General	Charity R Clark	109 State St		Montpelier	VT	05609
Office of the Attorney General	Bob Ferguson	800 5th Ave Ste 2000		Seattle	WA	98104
Office of the Attorney General	Bob Ferguson	1125 Washington St SE	PO Box 40100	Olympia	WA	98504
Office of the Attorney General	Josh Kaul	PO Box 7857		Madison	WI	53707
Office of the Attorney General	Patrick Morrissey	State Capitol Complex Bldg 1 Room E 26	1900 Kanawha Blvd E	Charleston	WV	25305
Office of the Attorney General	Bridget Hill	109 State Capital		Cheyenne	WY	82002
Department of Legal Affairs	<b>Fainu'ulei Falefatu Ala'ilima-Utu</b>	American Samoa Gov't Exec Ofc Bldg Utulei	Territory of American Samoa	Pago Pago	AS	96799
Attorney General Office of Guam	Douglas Moylan	Administrative Division	590 S Marine Corps Dr Ste 901	Tamuning	GU	96913
Office of the Attorney General	Edward Manibusan	Administration Bldg	PO Box 10007	Saipan	MP	96950
PR Department of Justice	Domingo Emanuelli Hernández	PO Box 9020192		San Juan	PR	00902
Department of Justice	Gordon C. Rhea	3438 Kronprindsens Gade Ste 2	GERS BLDG	St Thomas	VI	00802

**Email**

Appropriate Official	Contact Format	State
Office of the Attorney General for Connecticut	All documents sent to CT AG at their dedicated CAFA email inbox.	CT
Office of the Attorney General for Nevada	All documents sent to NV AG at their dedicated CAFA email inbox.	NV



**UPS**

Appropriate Official	FullName	Address1	Address2	City	State
US Department of Justice	Merrick B. Garland	950 Pennsylvania Ave NW		Washington	DC

# **Attachment 2**



Suite 3300  
920 Fifth Avenue  
Seattle, WA 98104-1610

**Ken Payson**  
**Partner, Commercial Litigation**  
206.757.8126 tel

kenpayson@dwt.com

August 30, 2024

***Via UPS or USPS Priority Mail***

Re: ***CAFA Notice of Proposed Settlement***  
*Williams, et al. v. PillPack LLC*, No. 3:19-cv-05282-DGE (United States District Court  
for the Western District of Washington)

Dear Federal or State Official:

I write as counsel to Defendant PillPack LLC (“Defendant”) in the above-referenced matter pending in the United States District Court for the Western District of Washington. Pursuant to 28 U.S.C. § 1715, Defendant hereby provides notice of a proposed class action settlement in that matter. Defendant denies any wrongdoing or liability whatsoever, but has decided to settle this action solely in order to eliminate the burden, expense, and uncertainties of further litigation. In compliance with 28 U.S.C. § 1715(b), the following documents referenced below are included in the enclosed CD-ROM:

1. **28 U.S.C. § 1715(b)(1) – Complaint and Related Materials:** Copies of the complaint and amended complaint are enclosed.
2. **28 U.S.C. § 1715(b)(2) – Notice of Any Scheduled Judicial Hearing:** There are no currently scheduled judicial hearings in this action.
3. **28 U.S.C. § 1715(b)(3) – Notification to Class Members:** A copy of the notice to be provided to the class is enclosed as exhibits to the *Settlement Agreement and Release of Claims*.
4. **28 U.S.C. § 1715(b)(4) – Proposed Class Action Settlement Agreement:** A copy of the proposed *Settlement Agreement and Release of Claims* is enclosed.
5. **28 U.S.C. § 1715(b)(5) – Any Settlement or Other Agreement:** As of the date of this letter, aside from the *Settlement Agreement and Release of Claims*, no other settlement or agreement has been made between class counsel and Defendant’s counsel.
6. **28 U.S.C. § 1715(b)(6) – Final Judgment:** As of the date of this letter, no final judgment or notice of dismissal have been entered in the action.
7. **28 U.S.C. § 1715(b)(7)(A) & (B) – Names of Class Members and Estimated Proportionate Share:** Providing the names of class members is not feasible at this time. 28

Federal or State Official

August 30, 2024

Page 2

U.S.C. § 1715(b)(7)(A). Plaintiff's counsel estimates the number of class members is approximately 30,271. 28 U.S.C. § 1715(b)(7)(B). Based on the settlement administrator's analysis, the estimated number of class members residing in each state and estimated proportionate share of the claims of such members to the entire settlement are as reflected in the enclosed document.

8. **28 U.S.C. § 1715(b)(8) – Written Judicial Opinions Related to the Settlement:** As of the date of this letter, there are no judicial opinions related to the materials described in 28 U.S.C. § 1715(b)(3)-(6).

9. **Other Material:** Although not required under 28 U.S.C. § 1715, also enclosed are (a) *Plaintiff's Unopposed Motion for Preliminary Approval* and (b) *Declaration of Blythe H. Chandler in Support of Plaintiff's Unopposed Motion for Preliminary Approval*.

Defendant will ask the Court to find that this Notice complies with 28 U.S.C. § 1715.

Defendant does not intend to supplement this Notice. If you have questions about this Notice, the lawsuit, or the enclosed materials, or if you did not receive any of the listed materials, please feel free to contact me.

Very truly yours,

Davis Wright Tremaine LLP



Enclosures

# Attachment 2

**From:** Williams v PillPack Settlement Administrator  
<PillPackTCPAClassAction@e.epiqnotice.com>  
**To:** [REDACTED]  
**Subject:** Williams v PillPack - Notice of Proposed Class Action Settlement

Claim ID: [REDACTED]

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON

CLASS ACTION SETTLEMENT NOTICE

If you received one or more prerecorded or artificial voice calls on your cellular telephone as part of the PillPack Performance Media campaign between March 13, 2018, and June 16, 2019, **you may be eligible for a payment from a class action settlement.**

**Records from the lawsuit reflect that you may have received such a call.**

**This Legal Notice Was Authorized by the Court**

Your rights and options are explained in this notice. Please read this notice carefully. Full information regarding the settlement is available at [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com)

You are receiving this notice because you might be a Settlement Class Member in *Williams v. PillPack LLC*, No. 3:19-cv-05282-DGE (W.D. Wash.). **The parties have reached a \$6.5 million settlement and you might be entitled to a payment if the settlement is approved by the Court. Class counsel estimates that payments could be between \$600 and \$1,500. This is an estimate, the final amount may be more or less depending on the number of claims that are filed. You must complete a Claim Form to get a payment.**

The lawsuit claims that the PillPack Performance Media campaign used a prerecorded voice to call cell phones without prior express written consent in violation of the Telephone Consumer Protection Act. PillPack LLC ("PillPack" or "Defendant") denies any wrongdoing and the Court has not decided whether PillPack did anything wrong. PillPack has asserted defenses that it believes would be successful at trial. In agreeing to settle, PillPack maintains that it complied with the law and does not admit any wrongdoing. More information is in a detailed notice available at the case website [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com).

**Am I a Settlement Class Member?** You may be a Settlement Class Member if you received one or more prerecorded calls between March 13, 2018 and June 16, 2019, as part of the

PillPack Performance Media campaign: (1) to your cell phone; (2) your call was transferred to a PillPack call center; and (3) Performance Media or its agents did not obtain your telephone number before calling you through certain websites between June 19, 2017 and May 3, 2019.

**How do I get a payment?** You must complete a Claim Form by **January 20, 2025** to get a payment. The Claim Form is available at [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com).

**What if I do nothing?** If you do nothing, you will stay in the Settlement Class, not receive a payment, and give up your right to bring your own lawsuit about the calls.

**What are my other options?** You can exclude yourself from the Settlement Class and keep any right you may have to sue PillPack about the calls in a separate case, or object to the settlement if you disagree with it. You must mail a written statement to the Settlement Administrator postmarked by **January 20, 2025** to exclude yourself or object. More information about what to include in your exclusion request or objection is available at [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com).

**Who represents me?** The Court has appointed a team of lawyers from Terrell Marshall Law Group, Paronich Law, and Smith & Deitrich Law Offices to serve as Class Counsel. They will ask to be paid reasonable legal fees of up to \$2,166,450 and costs of \$347,000. They will also request a Class Representative Award of \$20,000 for Aaron Williams.

**When will the Court consider the settlement?** The Court will hold a Final Approval Hearing on **April 18, 2025 at 9 a.m.** at the U.S. Courthouse, 1717 Pacific Avenue, Tacoma, WA 98402. At that hearing, the Court will hear any objections concerning the fairness of the settlement, decide whether to approve the requested attorneys' fees and costs, service award, and determine whether the settlement should be approved.

**How can I get more information?** A more detailed notice and important case documents are at [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com). You can also contact the Settlement Administrator at 855-654-0837, or write to Terrell Marshall Law Group PLLC, 936 N. 34th Street, Suite 300, Seattle, Washington 98103. Do not contact the Court with questions.

AK661 v.03

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If [REDACTED] should not be subscribed or if you need to change your subscription information for Williams v PillPack Settlement, [please use this preferences page](#).



# Attachment 3



You are receiving this notice because you might be a Settlement Class Member in a class action lawsuit entitled *Williams v. PillPack LLC*, No. 3:19-cv-05282-DGE (W.D. Wash.). **The parties have reached a proposed \$6.5 million settlement and you may be entitled to a payment if the settlement is approved by the Court. Class counsel estimate that payments will be between \$600 and \$1,500. This is only an estimate, the final amount may be more or less depending on the number of claims received. You must complete a Claim Form to get a payment.** More information is in a detailed notice available at the case website [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com).

**Am I a Settlement Class Member?** You might be a class member if you received one or more prerecorded calls between March 13, 2018 and June 16, 2019, as part of the PillPack Performance Media campaign: (1) to your cell phone; (2) your call was transferred to a PillPack call center; and (3) Performance Media or its agents did not obtain your telephone number before calling you through certain websites between June 19, 2017 and May 3, 2019. Records from the lawsuit reflect that you may have received such a call.

**How do I get a payment?** To get a payment you must complete a Claim Form by **January 20, 2025**. Return the attached tear-off Claim Form or visit [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com) to submit your claim online.

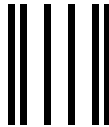
**What if I do nothing?** If you do nothing, you will stay in the Settlement Class, not receive a payment, and give up your right to bring your own lawsuit about the calls.

**What are my other options?** You can exclude yourself from the Settlement Class and keep any right to sue PillPack about the calls in a separate case, or object to the Settlement if you disagree with it or the attorneys' fees, costs, and/or service award. You must mail a written statement to the Settlement Administrator postmarked by **January 20, 2025** to exclude yourself or object. More information about what to include in your exclusion request or objection is available at [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com). You can also appear at the final fairness hearing on **April 18, 2025 at 9 a.m.** at the U.S. Courthouse, 1717 Pacific Avenue, Tacoma, WA 98402. Any changes will be posted at [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com).

**Who represents me?** The Court has appointed a team of lawyers from Terrell Marshall Law Group, Paronich Law, and Smith & Deitrich Law Offices to serve as Class Counsel. They will petition to be paid reasonable legal fees of \$2,166,450 and costs of \$347,000. They will also request a Class Representative Award of \$20,000 for Aaron Williams. You may object to the attorneys' fees, costs, and/or service award requested. The motion for attorneys' fees, costs and a service award, and all supporting materials, will be filed with the Court and posted online at [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com) by November 21, 2024.

**This Notice is a summary. Details about the case are on the website:  
[www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com). Please do not contact the Court.**

AK6552 v.01

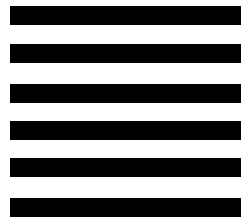


NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES

**BUSINESS REPLY MAIL**  
FIRST-CLASS MAIL PERMIT NO. 581 PORTLAND, OR

POSTAGE WILL BE PAID BY ADDRESSEE

WILLIAMS V PILLPACK  
SETTLEMENT ADMINISTRATOR  
C/O EPIQ  
PO BOX 5563  
PORTLAND OR 97228-9846



# Attachment 4

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON

Notice of Proposed Class Action Settlement

*Williams v. PillPack LLC*  
Case No. 3:19-cv-05282-DGE

**If a prerecorded or artificial voice call promoting PillPack’s services as part of the PillPack Performance Media campaign was placed to your cellular telephone between March 13, 2018 and June 16, 2019, and the call was transferred to a PillPack call center, you may be entitled to a payment from a class action settlement.**

Class counsel estimates that payments could be between \$600 and \$1,500. This is only an estimate, the final amount may be more or less depending on the number of claims filed. You must complete a Claim Form to get a payment.

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

- A settlement has been proposed to end a class action lawsuit against PillPack LLC (“PillPack” or “Defendant”), known as *Williams v. PillPack LLC*, Case No. 3:19-cv-05282-DGE (W.D. Wash.) (the “Lawsuit”) for violations of the Telephone Consumer Protection Act (TCPA). The Lawsuit alleges that telemarketers placed prerecorded telephone calls to cellular telephones as part of a PillPack Performance Media campaign, and that those calls were transferred to a PillPack call center. The Plaintiff, Aaron Williams, alleges that PillPack did not have prior express written consent to place the calls.
- Defendant denies any wrongdoing. Defendant claims it has abided by all state and federal laws, and that the Lawsuit is not well grounded in law or fact. As part of the proposed settlement, Defendant does not admit to any wrongdoing, maintains its compliance with the law, and continues to deny the allegations against it.
- The parties in the Lawsuit have agreed to resolve the lawsuit with a \$6,500,000 settlement to resolve the claims of a Settlement Class defined as follows:

Persons or entities in the United States who between March 13, 2018, and June 16, 2019, received a non-emergency telephone call promoting goods and services on behalf of PillPack, LLC as part of the PillPack Performance Media campaign:

(i) to a cellular telephone number through the use of an artificial or prerecorded voice; and

(ii) Performance Media or its agents live transferred the call to a PillPack call center on the DNIS 866-298-0058; and

(iii) Performance Media or its agents did not obtain the cellular telephone number through Rewardzoneusa.com, Nationalconsumercenter.com, finddreamjobs.com, instantplaysweepstakes.com, startacareertoday.com, samplesandsavings.com, sweepstakesaday.com, surveyvoices.com, or financedoneright.com between June 19, 2017, and May 3, 2019, before the date(s) of the call(s).

The Settlement Class does not include Defendant, any entity that has a controlling interest in Defendant, and Defendant’s current or former directors, officers, counsel, and their immediate families. The Settlement Class also does not include any person who validly requests exclusion from the Settlement Class, or Melvin Tyson, who validly requested exclusion from the certified class.

- The Court has scheduled a Final Approval Hearing for **April 18, 2025**. If the settlement is approved and becomes final, you will be issued a payment if (i) you are a member of the Settlement Class; and (ii) you file a valid Claim Form before **January 20, 2025**. Even if you do not file a Claim Form, your rights will be affected if you are a member of the Settlement Class and you do not exclude yourself from the settlement. Read below or call 1-855-654-0837 for more information.

**Questions? Go to [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com) or call 1-855-654-0837**

<b>YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT:</b>	
<b>FILE A CLAIM BY JANUARY 20, 2025</b>	<p><b>This is the only option that allows you to get a payment.</b></p> <p>If you are a member of the Settlement Class, you have a right to complete a Claim Form to share in the settlement proceeds paid by PillPack to settle the Lawsuit. A Claim Form can be (a) completed and submitted electronically on the website, or (b) printed, completed, and submitted by mail.</p> <p>If your Claim Form is approved and the settlement is approved by the Court and becomes final, you give up your right to bring your own lawsuit about the issues in this Lawsuit</p>
<b>DO NOTHING</b>	<p><b>Stay in this lawsuit. Get no payment. Give up certain rights.</b></p> <p>By doing nothing, you will not get a payment from the settlement. But, you give up any rights to sue PillPack separately about the same legal claims in this lawsuit.</p>
<b>ASK TO BE EXCLUDED BY JANUARY 20, 2025</b>	<p><b>Get out of this lawsuit. Get no payment. Keep rights.</b></p> <p>If you ask to be excluded, you will not get a payment from the settlement, but, you keep any rights you may have to sue PillPack separately about the same legal claims in this lawsuit.</p>
<b>OBJECT TO THE SETTLEMENT BY JANUARY 20, 2025</b>	<p><b>Tell the Court why you disagree with the settlement.</b></p> <p>If you do not exclude yourself from the settlement, you may object to or comment about the settlement and/or the request for attorneys’ fees, costs, and/or service award to the Class Representative who brought this Lawsuit. If you want to get a Claimant Award from the settlement, you also have to complete a Claim Form.</p>

## Basic Information

### 1. Why did I get this notice?

Records indicate that you may have received a prerecorded or artificial voice call as part of the PillPack Performance Media campaign and that call was transferred to a PillPack call center. This notice explains that the Court has granted preliminary approval of a settlement that may affect you. You have legal rights and options that you may exercise before the Court decides whether to approve the settlement. To get a payment from the settlement, you must complete a Claim Form by **January 20, 2025**. Judge David G. Estudillo of the United States District Court for the Western District of Washington is overseeing this class action. The lawsuit is known as *Williams v. PillPack, LLC*, No. 3:19-05282-DGE (W.D. Wash.) (the “Lawsuit”).

### 2. What is this lawsuit about?

In a class action, one or more people, called class representatives, sue on behalf of people who have similar claims. All of these people are a class, or class members. One court resolves the issues for all class members, except those who exclude themselves from the class.

Here, the Class Representative alleges that PillPack is liable for TCPA violations caused by its agents making prerecorded or artificial voice telemarketing calls to cellular telephones and then live transferring those calls to a PillPack call center. The Class Representative alleges that class members did not give permission to receive these calls.

The Court certified a Class that includes:

Persons or entities in the United States who between March 13, 2018, and June 16, 2019, received a non-emergency telephone call promoting goods and services on behalf of PillPack, LLC as part of the PillPack Performance Media campaign:

- (i) to a cellular telephone number through the use of an artificial or prerecorded voice; and

**Questions? Go to [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com) or call 1-855-654-0837**

- (ii) Performance Media or its agents live transferred the call to a PillPack call center on the DNIS 866-298-0058; and
- (iii) Performance Media or its agents did not obtain the cellular telephone number through Rewardzoneusa.com, Nationalconsumercenter.com, finddreamjobs.com, instantplaysweepstakes.com, startacareertoday.com, samplesandsavings.com, sweepstakesaday.com, surveyvoices.com, or financedoneright.com between June 19, 2017, and May 3, 2019, before the date(s) of the call(s).

Defendant PillPack denies any wrongdoing and believes it has fully complied with the law. Defendant has asserted many defenses it believes would be successful at trial. In agreeing to settle, Defendant maintains that it complied with the law and does not admit any wrongdoing. The settlement is not an admission of wrongdoing. The Court has not decided whether PillPack did anything wrong. If the Court approves the settlement, there will be no trial about the claims in the lawsuit.

### 3. What is a class action and who is involved?

In a class action, one or more people, called class representatives (in this case, Aaron Williams), sue on behalf of people who have similar claims. These people together are called a class, or class members. The class representative who sued, and all class members like him, are called Plaintiffs. The company he sued (in this case, PillPack LLC) is called the Defendant. One court resolves the issues for everyone in the class except for those people who choose to exclude themselves from the class.

### 4. Why is this lawsuit a class action?

The Court decided that this lawsuit can be a class action and move towards a trial because it meets the requirements of Federal Rule of Civil Procedure 23, which governs class actions in federal courts. Specifically, the Court found that:

- (a) Questions of law or fact common to the members of the classes predominate over any questions affecting only individual members; and
- (b) A class action is superior to other available methods for the fair and efficient adjudication of the controversy.

### 5. What has happened in the lawsuit?

The Plaintiff filed his complaint. PillPack filed an answer that denies Plaintiff's allegations. The Court granted class certification. The Parties subsequently agreed to a settlement and the Court has granted preliminary approval of the proposed settlement.

## Who Is In the Settlement Class

### 6. Am I part of the Settlement Class?

You are a member of the Settlement Class if you (1) received a prerecorded voice call as part of the PillPack Performance Media campaign between March 13, 2018, and June 16, 2019; (2) Performance Media or its agents live transferred the call to a PillPack call center on the DNIS 866-298-0058; and (3) Performance Media or its agents did not obtain the cellular telephone number through Rewardzoneusa.com, Nationalconsumercenter.com, finddreamjobs.com, instantplaysweepstakes.com, startacareertoday.com, samplesandsavings.com, sweepstakesaday.com, Surveyvoices.com, or Financedoneright.com between June 19, 2017, and May 3, 2019, before the date(s) of the call(s).

If you received a notice of this settlement via email or email, that means records indicate that you might be part of the Settlement Class.

The Settlement Class does not include PillPack, any entity that has a controlling interest in PillPack, and PillPack's current or former directors, officers, counsel, and their immediate families.

The Settlement Class also does not include any person who validly requests exclusion from the Settlement Class, or Melvin Tyson, who validly requested exclusion from the certified class.

**Questions? Go to [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com) or call 1-855-654-0837**

## The Proposed Settlement

### 7. What are the terms and benefits of the Settlement?

The complete terms of the settlement are found in the Settlement Agreement. This notice only provides a summary.

If the settlement is approved and becomes final, PillPack will pay \$6.5 million (\$6,500,000) into a Settlement Fund. This money will be used to: (1) make Claimant Awards to Settlement Class Members who complete a valid Claim Form, (2) pay the costs of distributing notice and settlement payments to Settlement Class Members and other costs of administering the settlement; and (3) pay court-awarded attorneys' fees and litigation expenses of the attorneys appointed by the Court to represent the Class ("Class Counsel") and any service award granted to the Class Representative.

**Class Counsel estimate that payments could be between \$600 and \$1,500. This is only an estimate, the final amount may be more or less depending on the number of claims that are made. You must complete a Claim Form to get a payment.**

### 8. What claims will be released by the Settlement?

If you stay in the Settlement Class you will be giving up any and all claims against PillPack or related entities for prerecorded voice calls about PillPack made from March 13, 2018, to June 16, 2019.

Specifically, the settlement will release any and all claims, rights (including rights to restitution or reimbursement), demands, actions, causes of action, suits, liens, damages, attorneys' fees, obligations, contracts, liabilities, agreements, costs, expenses or losses of any nature, whether known or unknown, direct or indirect, matured or unmatured, contingent or absolute, existing or potential, suspected or unsuspected, equitable or legal, and whether under federal statutory law, federal common law or federal regulation, or the statutes, constitutions, regulations, ordinances, common law, or any other law of any and all states or their subdivisions, parishes or municipalities that arise out of or relate in any way to prerecorded voice message calls placed as part of the PillPack Performance Media Campaign (collectively, "Claims"), that have been, or could have been, brought in the Action, as well as any Claims arising out of the same nucleus of operative facts as any of the claims asserted in the Action.

The full Settlement Agreement is available on the Settlement Website at [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com).

### 9. How are Claimant Award payments calculated?

If the settlement is approved and becomes final, Settlement Class Members who complete and submit a valid Claim Form will be issued a payment. Settlement Class Members' payment amounts will be shared equally among all Settlement Class Members who submit valid Claim Forms, after the Court-ordered deduction of settlement costs, attorneys' fees, expenses, and any service award granted to the Class Representative. Class Counsel estimate that payments could range between \$600 and \$1,500 per claimant, although the actual amount could be higher or lower depending on how many valid Claim Forms are received.

If you are a Settlement Class Member, *to receive a payment you need to complete and submit a Claim Form by January 20, 2025*. The Claim Form allows Settlement Class Members to elect the method by which to receive payments including paper checks or electronic payment.

For any payments that are uncashed or deemed undeliverable by the Settlement Administrator, the funds will be distributed by one or both of the following means: (1) a pro rata second distribution to those Settlement Class Members who cashed/received their initial payments (if there are sufficient residual funds to justify the administrative costs of such distribution); and/or (2) distribution to the Legal Foundation of Washington.

## Your Rights And Options

You must decide whether to stay in the Settlement Class, whether to make a claim for a payment, whether to object to the settlement, or whether to exclude yourself from the Settlement Class.

**Questions? Go to [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com) or call 1-855-654-0837**



**10. How do I get a payment?**

Complete a Claim Form by **January 20, 2025**. This is the only way to get a payment from the settlement. The Claim Form requires you to confirm that you were the owner or regular user of a phone number in the calling date during the date of the calls and that, to the best of your knowledge and belief, you did not provide prior written consent to receive the prerecorded call(s). The Claim Form allows Settlement Class Members to elect the method by which to receive payments including paper checks or electronic payment.

Once completed, the Claim Form can be submitted electronically on the settlement website or printed and mailed to the following address:

PillPack Settlement Administrator  
P.O. Box 5563  
Portland, OR 97228-5563

Mailed Claim Forms must be postmarked by **January 20, 2025**. Each Settlement Class Member is entitled to submit only one Claim Form, regardless of the number of calls they received. If you submit a Claim Form through the Settlement Website, please do not submit a duplicate Claim Form by mail, and vice versa. Duplicate claim forms will be rejected.

**11. What happens if I do nothing at all?**

By doing nothing, you are staying in the Settlement Class, but you are giving up the ability to get a payment from the settlement. To get a payment you must complete a claim form by **January 20, 2025**. By doing nothing or completing a Claim Form, you are choosing to stay in the Settlement Class and if the settlement becomes final, you give up any rights to sue the Defendant separately about the same issues in this Lawsuit. See Question 8.

By staying in the Settlement Class, you may object to or comment on the settlement and/or or to Class Counsel's request for attorneys' fees, litigation expenses, and service awards. You do not need to object or comment in order to receive a payment.

**12. How do I object or comment?**

If you are a Settlement Class Member, and have not excluded yourself from the settlement, you can comment on or object to the settlement, request for attorneys' fees, costs and/or service award for the Class Representative. The motion for attorneys' fees, costs and a service award, and all supporting materials, will be filed with the Court and posted online at [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com) by November 21, 2024. To object or comment, you must send a written objection/comment including the following:

- (a) the name and case number of this Lawsuit (*Williams v. PillPack LLC*, No. 3:19-cv-05282-DGE (W.D. Wash.));
- (b) your full name, mailing address, and telephone number;
- (c) all objections and the basis for any such objections stated with specificity, including a statement as to whether the objection applies only to the objector, to a specific subset of the class, or to the entire class, and an explanation of the basis for your contention that you are a Settlement Class Member, including the cellular telephone numbers on which you received a call you assert was part of the PillPack Performance Media campaign;
- (d) if you are represented by counsel, the name and telephone number of any attorney representing you in this matter, or any attorney who may be entitled to compensation for any reason related to the objection, whether counsel intends to submit a request for fees, and all factual and legal support for that request;
- (e) a statement of whether or not you intend to appear at the Final Approval Hearing, and if so, the identity of all counsel representing you who will appear at the Final Approval Hearing (who must enter a written Notice of Appearance of Counsel with the Clerk of the Court);
- (f) the identity of any witnesses you may call to testify;

**Questions? Go to [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com) or call 1-855-654-0837**

(g) a listing of all exhibits you intend to introduce into evidence at the Final Approval Hearing, as well as true and correct copies of such exhibits.

Your comment or objection must be postmarked no later than **January 20, 2025**, and mailed to the following address:

PillPack Settlement Administrator  
P.O. Box 5563  
Portland, OR 97228-5563

### 13. How do I ask to be excluded from the Settlement Class?

To exclude yourself from the Settlement, you must mail a written request for exclusion, which includes the following:

- The case name and number (*Williams v PillPack LLC*, No. 3:19-cv-05282-DGE);
- Your name, address, and telephone number; and
- A clear statement that you want to be excluded from the Settlement Class, such as “I hereby request to be excluded from the Settlement Class in *Williams v PillPack LLC*, No. 3:19-cv-05282-DGE.”
- Your signature and the date.

The exclusion request must be sent to the Settlement Administrator at the following address postmarked by **January 20, 2025**:

Williams v PillPack Settlement Administrator  
P.O. Box 5563  
Portland, OR 97228-5563

You cannot exclude yourself by telephone or by email, and you cannot opt out on behalf of anyone else.

You have the right to exclude yourself if for any reason you do not wish to be part of the Settlement Class. If you are already pursuing claims against PillPack for violations of telemarketing laws, or plan to pursue such claims, you should talk to your lawyer in that matter. You should exclude yourself from the Settlement Class if you wish to separately make claims against PillPack based on telemarketing. If you exclude yourself from the Settlement Class—which also means to remove yourself from the Class, and is sometimes called “opting-out” of the Class—you will not get a payment from the Settlement.

## The Lawyer s Representing You

### 14. Do I have a lawyer in this case?

The Court has appointed Terrell Marshall Law Group PLLC, Smith & Dietrich Law Offices PLLC, and Paronich Law PC to represent you and all Settlement Class Members. These lawyers are called Class Counsel. They are experienced in handling similar cases. More information about the law firms, their practices, and their lawyers’ experience is available at [www.terrellmarshall.com](http://www.terrellmarshall.com), [www.smithdietrich.com](http://www.smithdietrich.com), and [www.paronichlaw.com](http://www.paronichlaw.com).

### 15. Should I get my own lawyer?

You do not need to hire your own lawyer because Class Counsel is working on your behalf. But, if you want your own lawyer, you will have to hire them on your own. For example, you can ask a lawyer to appear in Court for you if you want someone other than Class Counsel to speak for you. If you hire a lawyer to speak for you or to appear in Court, your lawyer should file a Notice of Appearance with the Court.

### 16. How will the lawyers be paid?

Class Counsel (lawyers from Terrell Marshall Law Group, Paronich Law, and Smith & Deitrich Law Offices) will ask the Court to approve payment of legal fees of \$2,166,450, which is one third (33.33%) of the \$6,500,000 settlement fund, and costs of \$347,000 from the settlement. They will also request a Service Award of \$20,000 for Aaron Williams.

**Questions? Go to [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com) or call 1-855-654-0837**

## The Court's Final Approval Hearing

### 17. When and where will the Court decide whether to approve the settlement?

The Court will hold a Final Approval Hearing at **9 a.m. on April 18, 2025**, in Courtroom B of the United States District Court for the Western District of Washington in Tacoma, 1717 Pacific Avenue, Tacoma, WA 98402. The hearing may be moved to a different date or time, or the Court may order that the hearing be held telephonically or by videoconference, without additional notice. Please check the Settlement Website for updates or changes.

At the Final Approval Hearing, the Court will consider whether the settlement is fair, reasonable, and adequate. The Court will also consider the request for attorneys' fees, costs, and a service award. If there are objections, the Court will consider them. After the hearing, the Court will decide whether to approve the settlement. We do not know how long these decisions will take.

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

No. You do not have to attend or participate in the hearing to receive a payment. Class Counsel will answer any questions the Court may have. But you are welcome to come at your own expense. If you submit an objection, you do not have to come to the Court to talk about it, but you can at your own expense. So long as you submitted your written objection on time, the Court will consider it. You may also pay your own lawyer to attend, but it is not necessary.

### 19. May I speak at the hearing?

If you are a Settlement Class Member and have not opted out of the settlement, you may ask the Court for permission to speak at the Final Approval Hearing. You cannot speak at the hearing if you exclude yourself from the Settlement Class.

## Getting More Information

### 20. Are there more details available?

If you have questions that are not answered in this notice, you can speak to Class Counsel by calling 1-855-349-7023 toll-free or by writing to Terrell Marshall Law Group PLLC, 936 N 34th Street, Suite 300, Seattle, WA 98103. Complete copies of public pleadings, Court rulings and other filings are available for review and copying at [www.pacer.uscourts.gov](http://www.pacer.uscourts.gov).

**PLEASE DO NOT CONTACT THE COURT, THE JUDGE, OR THE DEFENDANT WITH QUESTIONS ABOUT THE ACTION**

**Questions? Go to [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com) or call 1-855-654-0837**

# Attachment 5

*Williams v. PillPack LLC*, Case No. 3:19-cv-05282-DGE (W.D. Wash.)

**Claim Form**

Complete and return this Claim Form by January 20, 2025, to claim your payment. You may submit your Claim Form by mail to the following address:

PillPack Settlement Administrator  
P.O. Box 5563  
Portland, OR 97228-5563

**I. Claim Verification**

Did you receive a Claim ID by mail or email? The Claim ID is located on the front of the postcard notice or at the top of the email notice you may have received.

Yes

Claim ID:

Grid for Claim ID: 10 empty boxes

No

**II. Class Member Identifying Information**

Please provide your name and contact information below. The Settlement Administrator will use the email address you provide below to communicate with you. You must notify the Settlement Administrator if your contact information changes after you submit this form.

First Name

Grid for First Name: 20 empty boxes

MI

Grid for MI: 2 empty boxes

Last Name

Grid for Last Name: 30 empty boxes

Street Address

Grid for Street Address: 40 empty boxes

City

Grid for City: 25 empty boxes

State

Grid for State: 2 empty boxes

ZIP Code

Grid for ZIP Code: 5 empty boxes

Current Phone Number

Grid for Current Phone Number: ( ) ( ) ( ) - ( ) ( ) ( ) ( ) - ( ) ( ) ( ) ( )

Email Address

Grid for Email Address: 40 empty boxes

Cell Phone Number Used from March 2018 to June 2019

Grid for Cell Phone Number: ( ) ( ) ( ) - ( ) ( ) ( ) ( ) - ( ) ( ) ( ) ( )

**III. Attestation**

I attest that the following statements are true (check each box to indicate your agreement):

- I owned or was the regular user of the cell phone number listed on this Claim Form during the time period from March 13, 2018, to June 16, 2019; and
- To the best of my knowledge and belief, I did not provide prior express written consent to receive the prerecorded call(s).



#### IV. Payment Selection

Please select **one** of the following payment options:

- Electronic Payment** – If your claim is approved, an email will be sent to the email address provided above in Section II containing more information about electronic payment.
- Physical Check** – If your claim is approved, your payment will be mailed to the address provided in Section II above.

#### V. Certification & Signature

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Signature

Date: 

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MM                  DD                  YYYY



# Attachment 6



Liam Payne dies | Israel missile defense | Biden in Germany | VP Harris interview | Military extremism >

Weight loss drugs may help overdose risks: Study

Moreno's abortion comment rattles debate in expensive Senate race in Republican-leaning Ohio

Listeria recall grows to 12M pounds of food

Trump and Harris medical records: What to know

Americans can order free COVID tests again

Democrats hope the latest court rulings restricting abortion energize voters as election nears

Indigenous women face barriers to care

3 states renew their effort to reduce access to the abortion drug mifepristone

Dolphins quarterback Tua Tagovailoa expected to play again this season

**If you received a prerecorded cell phone call promoting PillPack's services between March 13, 2018 and June 16, 2019,**



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**you may be eligible for a settlement payment.**

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If you received a prerecorded cell phone call promoting PillPack's services between March 13, 2018 and June 16, 2019,



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### Burger King Offering Free 8oz Ranch 'Big Dip' Cup with Sandwiches: What Nutritionists Think

Burger King announced it will begin offering free 8oz "Big Dip" tubs of ranch dressing for dipping with any sandwich. Here's how that can...

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OCTOBER 16, 2024

### Around 1 in 4 U.S. Adults Suspect They Have ADHD. What Are the Signs?

A new survey reports that 25% of adults in the United States believe they have ADHD, but half of them don't tell their doctor about their suspicions...

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### Burger King Offering Free 8oz Ranch ‘Big Dip’ Cup with Sandwiches: What Nutritionists Think

Burger King announced it will begin offering free 8oz “Big Dip” tubs of ranch dressing for dipping with any sandwich. Here’s how that can...

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### Around 1 in 4 U.S. Adults Suspect They Have ADHD. What Are the Signs?

A new survey reports that 25% of adults in the United States believe they have ADHD, but half of them don’t tell their doctor about their suspicions...

**BREAKING NEWS**



**Israel's military is investigating whether Hamas leader Yahya Sinwar was killed in Gaza. Watch CNN**

# Health



Ethan Cairns/Bloomberg/Getty Images

## Coca-Cola recalled thousands of cases of lemonade mislabeled as 'zero sugar'



New cervical cancer treatment cuts risk of death from disease, according to trial results



IV fluid supply disruptions prompt Biden administration to invoke wartime powers to bolster recovery



Human sense of smell is faster than previously thought, new study suggests



That online 'herb' could kill you, feds warn



**BREAKING NEWS**



**Israel's military is investigating whether Hamas leader Yahya Sinwar was killed in Gaza.**  
Watch CNN

# Health



Ethan Caimo/Bloomberg/Getty Images

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New cervical cancer treatment cuts risk of death from disease, according to trial results



IV fluid supply disruptions prompt Biden administration to invoke wartime powers to bolster recovery



Human sense of smell is faster than previously thought, new study suggests



That online 'pharmacy' could kill you, feds warn

you may be eligible for a settlement payment. [Learn More](#)

**BREAKING NEWS**



**Israel's military is investigating whether Hamas leader Yahya Sinwar was killed in Gaza. Watch CNN**

# Health



Ethan Cairns/Bloomberg/Getty Images

## Coca-Cola recalled thousands of cases of lemonade mislabeled as 'zero sugar'



New cervical cancer treatment cuts risk of death from disease, according to trial results



IV fluid supply disruptions prompt Biden administration to invoke wartime powers to bolster recovery



Human sense of smell is faster than previously thought, new study suggests



That online 'pharmacy' could kill you, feds warn





- Friends (22 online)
- Memories
- Saved
- Groups
- Video
- Marketplace
- Feeds
- See more



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You may be eligible for a settlement payment if you received a prerecorded cell phone call promoting PillPack.



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**PillPack Settlement**

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1

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legal.notice Received a prerecorded cell phone call promoting PillPack? Settlement payments available.



# Attachment 7

# Received a prerecorded voice call about pharmacy services that was transferred to PillPack? Your Rights may be affected by a class action settlement

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
**United States District Court for the Western District of Washington →**

Nov 21, 2024, 16:02 ET

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Learn More at [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com)

SEATTLE, Nov. 21, 2024 /PRNewswire/ -- The Court has granted preliminary approval of a proposed \$6.5 million settlement in a lawsuit in which Plaintiff Aaron Williams claims that PillPack LLC ("PillPack" or "Defendant") violated the Telephone Consumer Protection Act ("TCPA") when prerecorded or artificial voice calls intending to promote PillPack's services were placed to cellular telephones between March 13, 2018 and June 16, 2019, and transferred to a PillPack call center. Defendant denies any wrongdoing. Defendant claims it has abided by all state and federal laws, and that the Lawsuit is not well grounded in law or fact. As part of the proposed settlement, Defendant does not admit to any wrongdoing, maintains its compliance with the law, and continues to deny the allegations against it.

You may be entitled to payment if, between March 13, 2018, and June 16, 2019, you received a non-emergency telephone call promoting goods and services on behalf of PillPack, LLC as part of the PillPack Performance Media campaign: (i) to a cellular telephone number through the use of an artificial or prerecorded voice; and (ii) Performance Media or its agents live transferred the call to a PillPack call center on the DNIS 866-298-0058; and (iii) Performance Media or its agents did not obtain the cellular telephone number through [Rewardzoneusa.com](http://Rewardzoneusa.com), [Nationalconsumercenter.com](http://Nationalconsumercenter.com), [finddreamjobs.com](http://finddreamjobs.com), 

[instantplaysweepstakes.com](http://instantplaysweepstakes.com), [startacareertoday.com](http://startacareertoday.com), [samplesandsavings.com](http://samplesandsavings.com), [sweepstakesaday.com](http://sweepstakesaday.com), [Surveyvoices.com](http://Surveyvoices.com), or [Financedoneright.com](http://Financedoneright.com) between June 19, 2017, and May 3, 2019, before the date(s) of the call(s).

Class Members who wish to receive a payment from the Settlement must complete and submit a claim form by **January 20, 2025**. To submit a claim, please visit [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com).

Class members have the right to exclude themselves from the Settlement if for any reason they do not wish to be part of the settlement class. To be excluded from the settlement class, please visit [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com) for instructions or call toll-free 1-855-654-0837. Class Members must mail their exclusion request postmarked by **January 20, 2025**.

The Court has appointed Terrell Marshall Law Group PLLC, Smith & Dietrich Law Offices PLLC, and Paronich Law PC as Class counsel. Detailed information is available at [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com) and toll-free at 1-855-654-0837. Class Members should not call the Court, PillPack personnel, its counsel, or any PillPack agent about this case.

/URL: [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com)

SOURCE United States District Court for the Western District of Washington

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# Attachment 8

**From:** Williams v PillPack Settlement Administrator  
<PillPackTCPAClassAction@e.epiqnotice.com>  
**To:** [REDACTED]  
**Subject:** Williams v PillPack - Notice of Class Action Settlement

Claims Code: [REDACTED]

**If you received a prerecorded voice call about pharmacy services that was transferred to a PillPack call center, you may be entitled to payment because of a class action settlement.**

**Records from the lawsuit reflect that you may have received such a call.**

**This Legal Notice Was Authorized by the Court**

You previously received notice of a Settlement in a class action lawsuit that makes claims against PillPack under the Telephone Consumer Protection Act. You have been identified as a potential Settlement Class member. **To receive a settlement payment, you must submit a valid Claim Form by January 20, 2025.** The claim form will request that you enter the Claims Code: [REDACTED] and the cell phone number you used between March 2018 and June 2019.

The parties have reached a \$6.5 million Settlement, and you may be entitled to a payment. Class Counsel estimates that **payments could be between \$600 and \$1,500**. This is only an estimate; the final amount may be more or less, depending on the number of claims filed. You must complete a Claim Form to get a payment.

You may be a Settlement Class Member if you received prerecorded calls between March 13, 2018, and June 16, 2019, as part of the PillPack Performance Media campaign: (1) to your cell phone; (2) your call was transferred to a PillPack call center; and (3) Performance Media or its agents did not obtain your telephone number before calling you through certain websites between June 19, 2017, and May 3, 2019.

If you are a member of the Settlement Class, to obtain a Settlement payment if the Settlement is approved, you must complete a Claim Form by **January 20, 2025**. You can make your claim online at [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com).

For more information visit [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com) or call 1-855-654-0837.

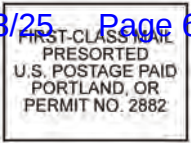
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If [REDACTED] should not be subscribed or if you need to change your subscription information for Williams v PillPack Settlement, [please use this preferences page](#).

# Attachment 9

PillPack Settlement Administrator  
P.O. Box 5563  
Portland, OR 97228-5563



COURT-ORDERED NOTICE

*Williams v. PillPack LLC*  
Class Action Settlement Notice

*If you received a prerecorded voice call that was transferred to a PillPack call center, you may be entitled to payment. Records from the lawsuit reflect that you may have received such a call.*

The claim deadline is  
January 20, 2025.

Claim ID: [REDACTED]



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Class Counsel estimates that **payments could be between \$600 and \$1,500**. This is only an estimate; the final amount may be more or less. You must complete a Claim Form by January 20, 2025, to get a payment. You can make your claim online at [www.PillPackTCPAClassAction.com](http://www.PillPackTCPAClassAction.com). The claim form will request that you enter the Claims Code [REDACTED] and the cell phone number you used between March 2018 and June 2019.