

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

VISHAL SHAH and JAYDEN KIM, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

FANDOM, INC.,

Defendant.

Case No.: 3:24-cv-01062-RFL

**SUPPLEMENTAL DECLARATION
OF LOREE KOVACH
REGARDING FRAUDULENT
CLAIMS ANALYSIS**

REDACTED

I, Loree Kovach, hereby declare and state as follows:

1. I am a Senior Vice President with Epiq Class Action & Claims Solution, Inc. I have approximately 20 years of experience overseeing all aspects of many large, complex, and high-profile consumer matters. With my extensive background in the class action administration profession, I am routinely called upon by clients to provide strategic direction for handling large, complex data and claim sets.

2. I received my Bachelor of Business Administration degree in finance from Florida State University and Juris Doctor degree from Florida State University College of Law. The following statements are based upon my personal knowledge and experience, information provided to me by other experienced Epiq employees working under my supervision, and review of Epiq's business records, in addition to information provided to me by Epiq's digital payment partner on this matter, Digital Disbursements. If called upon, I could and would testify competently thereto.

3. I submit this declaration to provide an update on the Fraud Verification Process for Claim Forms with Medium Indicia of Fraud and to supplement my Declaration Regarding Fraudulent Claims Analysis (Dkt. 88) previously provided to the Court.

CLAIM SUBMISSIONS & FRAUD OVERVIEW

4. The deadline for Settlement Class Members to file a Claim Form was April 16, 2026. The *Supplemental Declaration of Cameron R. Azari Regarding Implementation and Adequacy of Notice Plan* (“Supplement Azari Declaration”) executed on May 12, 2026 (Dkt. 85) reported to the Court that as of May 11, 2026, Epiq had received 401,930 Claim Forms (371 paper Claim Forms and 401,559 online Claim Forms). Of the 401,559 online Claim Forms received:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
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- [REDACTED]
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2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]

7 I declare under penalty of perjury that the foregoing is true and correct. Executed on August 13,
8 2026.

9 

10 _____
Loree Kovach