IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

IN RE: BESTWAY ABOVE-GROUND POOLS LITIGATION	Case No. 1:25-cv-09570 Judge: Honorable Lindsay C. Jenkins

PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Pursuant to Federal Rule of Civil Procedure 23, Plaintiffs Susana Castro, Pete Piceno, Shannon Gannon, Leah Holloway, Jamie DeSabio, Katrina Hill, and Lisa Weeks (collectively, "Plaintiffs" or "Class Representatives"), on behalf of themselves and the proposed Settlement Class, move for entry of an order: (1) granting final approval to the Settlement; (2) granting final certification of the Settlement Class; (3) finding that adequate notice was provided to the Settlement Class Members; and (4) approving Plaintiffs' request for attorneys' fees, expenses, and service awards previously filed with the Court on September 25, 2026 (Dkt. No. 65).

This motion is based on the accompanying memorandum of law, the Settlement Agreement and its exhibits, Class Counsel's Declaration in Support of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement, and all prior pleadings and proceedings herein. Defendants do not oppose this motion.

Dated: November 13, 2026.

Respectfully submitted,

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

IN RE: BESTWAY ABOVE-GROUND POOLS LITIGATION	Case No. 1:25-cv-09570 Judge: Honorable Lindsay C. Jenkins

PLAINTIFFS' MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Plaintiffs Susana Castro, Pete Piceno, Shannon Gannon, Leah Holloway, Jamie DeSabio, Katrina Hill, and Lisa Weeks ("Plaintiffs" or "Class Representatives")[1] submit this Memorandum in support of their Unopposed Motion for Final Approval of Class Action Settlement ("Motion").

I. INTRODUCTION

In this consolidated class action ("Action"), Plaintiffs assert that certain Bestway branded above-ground Pools ("Class Products" or "Pools") contain a safety defect that creates a potential drowning hazard, and that Defendants issued an inadequate recall that failed to offer consumers an adequate remedy, including monetary relief. Plaintiffs seek final approval of a $15,000,000.00 non-reversionary common-fund Settlement that provides meaningful monetary relief to purchasers of the Pools. The Settlement represents an outstanding result for the Settlement Class. As demonstrated herein, the Settlement is "fair, reasonable, and adequate" under Rule 23(e)(2) of the Federal Rules of Civil Procedure and thus warrants final approval. Plaintiffs respectfully ask the Court to: (1) grant final approval to the Settlement; (2) grant final certification of the Settlement Class; (3) find that adequate notice was provided to the Settlement Class; and (4) approve Plaintiffs' request for attorneys' fees, expenses, and service awards, filed on September 25, 2026. Dkt. No. 65.

II. BACKGROUND

A. Factual and Procedural History.

Prior to commencing litigation, Class Counsel performed significant background research and investigation regarding the Pools and the Recall, including expert investigation, reviewing product materials, reported incidents, prior litigation records and recall information, and interviewing potential Class Members. *See* Class Counsel's Declaration filed herewith ("Class Counsel Decl.") ¶ 14. Thereafter, numerous class action complaints against Defendants were filed

[1] All capitalized terms used throughout this Memorandum shall have the same meaning as they have in the Settlement Agreement. *See* Dkt. No. 61-1.

in different jurisdictions. *Id.* ¶¶ 6-9. Each case was transferred to this Court and, on November 6, 2025, the Court held an initial status conference and consolidated the cases into a single action styled: *In re: Bestway Above-Ground Pools Litigation*, No. 1:25-cv-09570 (N.D. Ill.). Dkt. No. 30. On November 24, 2025, Plaintiffs filed a Consolidated Amended Class Action Complaint, alleging claims on behalf of consumers nationwide, and also adding Plaintiff DeSabio. Dkt. No. 37.

Following Plaintiffs' extensive investigation and consolidation of the underlying actions, the Parties began to explore settlement. Before mediation, the Parties exchanged significant confidential discovery, including documents sufficient to identify all model numbers, brand names, product descriptions, retail pricing information, supply dates, number of Pools sold, and various additional information. Class Counsel Decl. ¶ 15. This information would have been subject to lengthy discovery efforts that could have taken months or longer to complete. *Id*. These discovery efforts were crucial in assessing the strengths and weaknesses of the case and permitted the Parties to evaluate the claims and negotiate an informed resolution thoroughly. *Id.*

The Parties participated in two full-day, in-person mediations in Philadelphia, Pennsylvania, before the Honorable Diane Welsh (Ret.), an experienced and highly regarded class action mediator. *Id.* ¶¶ 16-17. Following two full-day mediations and subsequent negotiations, the Settlement Agreement ("Settlement") was fully executed on April 30, 2026. Dkt. No. 61-1.

On May 4, 2026, the Court entered an order certifying the Settlement Class for settlement purposes and preliminarily approved the Settlement ("Preliminary Approval Order"). Dkt. No. 63. The Court found that the Settlement satisfied all of the class action prerequisites pursuant to Federal Rule of Civil Procedure 23. *Id.* at 4. The Court also found, among other items, that the Settlement is (1) the "product of non-collusive, arm's-length negotiations between experienced counsel, conducted after the exchange of sufficient information to evaluate the strengths and

weaknesses of the claims and defenses, and with the assistance of Judge Welsh," (2) "compares favorably with the expected recovery balanced against the risks of continued litigation; it has no obvious deficiencies; and it is in the best interest of the Settlement Class," and (3) is fair, reasonable and adequate. *Id.* at 4-5. In addition, the Court found that the proposed Class Notice "is the best notice practicable under the circumstances and satisfies the requirements of Rule 23 of the Federal Rules of Civil Procedure, due process and all other applicable law and rules" and appointed EisnerAmper LLP to serve as the Settlement Administrator. *Id.* at 7-8. The Court also reaffirmed Kevin Laukaitis of Laukaitis Law LLC and Rachel Soffin of Pearson Warshaw, LLP as Co-Lead Class Counsel and Leslie Pescia of Siri Glimstad, Nick Suciu of Bryson Harris Suciu & DeMay PLLC, Charles D. Moore of Reese LLP, Jason Sultzer of Sultzer & Lipari, PLLC and Alec Schultz of Hilgers Graben PLLC to the Executive Committee. *Id.* at 5.

B. The Settlement's Material Terms and Notice Plan.

Plaintiffs seek final approval of the Settlement on behalf of the following Class:

> All Persons in the United States (including states, districts, territories, and tribal reservations) who purchased a Class Product, for personal use and not for resale, before the date of the Preliminary Approval Order.
>
> Specifically excluded from the Settlement Class are the following:
>
> (1) the presiding judge and immediate family; (2) Defendants and their parents, subsidiaries, affiliates, and their current and former officers, directors, employees, agents, and counsel; (3) Persons who timely and properly Opt-Out; (4) successors/assigns of excluded Persons; (5) wholesalers, distributors, or retailers of the Class Products; (6) second-hand purchasers; (7) any federal, state, or local governmental entity; and (8) Class Counsel.

Settlement § II(1).

1. The Settlement Includes Significant Monetary Relief to The Settlement Class.

The Settlement provides for a $15,000,000.00 *non-reversionary all-cash* Settlement Fund, which shall be used to pay: (1) Cash Payments to Settlement Class Members with valid claims;

(2) Court-approved Service Awards to Class Representatives; (3) Court-approved Attorneys' Fees and Cost Reimbursement to Class Counsel; and (4) all Settlement Notice and Administration Costs. *Id.* §§ I(53), III. Settlement Class Members submitting Valid Proof of Purchase shall receive a Cash Payment equal to ten percent (10%) of either: (i) the actual purchase price as reflected in the Valid Proof of Purchase (e.g., receipt); or (ii) if the Valid Proof of Purchase does not reflect the actual purchase price, the Average Retail Price assigned to the identified Class Product in the product pricing schedule Defendants provided. *Id.* § V(7)(b). Settlement Class Members without Valid Proof of Purchase shall receive a Cash Payment of $40.00. *Id.* § V(7)(c).

Any remaining funds will first be distributed on a *pro rata* basis to participating Settlement Class Members up to a total Cash Payment equal to one time the amount claimed (*Id. § VI(2)(b)*), before any residual funds are distributed to the *Cy Pres* Recipient. *Id.* § VI(2)(d). Pursuant to the Settlement, the *Cy Pres* Recipients shall be nonprofit organizations with missions reasonably related to consumer safety, product safety, or drowning prevention, and shall have no affiliation with the Parties or their counsel. *Id.* § I(20). Class Counsel Decl. ¶¶ 27-28. Subject to Court approval, the Parties propose that any funds available for *Cy Pres* distribution be split equally among the following three organizations, each of which focuses on these critical issues.

Boys and Girls Club of Chicago ("BGCC") Aquatics Program plays a critical role in promoting water safety to youth in need in several of Chicago's most under-resourced communities. The majority of youth participants in the BGCC have never taken swimming lessons. BGCC helps remove barriers by offering free year-round swim instruction to club members at its many indoor pools in communities surrounded by few or no other free or public pools. As a Red Cross Learn to Swim provider, BGCC's program features a proven six-level progression for swimmers ages six and older, building essential water safety, survival, and swimming skills.

Through this developmentally appropriate curriculum, youth learn to swim proficiently and safely and to think and act responsibly in, on, and around water, a critical life skill in a city surrounded by water. BGCC's operational budget is significant, and funds received would be used to staff, operate, and maintain the Aquatics program, including necessary pool facility upgrades providing critical infrastructure needed to offer life-saving swim lessons without disruption at its clubs.

Touched by Luke, Inc., a 501(c)(3) doing business as **Saved by Luke**, works to prevent childhood drowning by providing scholarships for survival swim lessons to children whose families cannot afford them. Robin and Ian Leavengood founded Saved by Luke in honor of their son, Luke, who drowned in a neighbor's unfenced pool on November 8, 2012, at 21 months old. Saved by Luke pursues its mission through three initiatives: (1) scholarships for survival, or "self-rescue," swim instruction, which teaches young children to roll onto their backs, float, and breathe if they fall into the water; (2) education for parents, caregivers, and communities about drowning risks and survival swim instruction; and (3) advocacy for laws and policies that strengthen drowning prevention and pool safety. Funds awarded to Saved by Luke would go directly to this lifesaving work. Its primary program is a survival swim scholarship available to families anywhere in the United States. Families apply through the Saved by Luke website, and Saved by Luke pays tuition directly to qualified, pre-screened survival swim instructors.

Abbey's Hope Charitable Foundation is a nonprofit dedicated to protecting children and families from preventable swimming-pool injuries. The Foundation was established in honor of six-year-old Abbey Taylor, who suffered a fatal injury caused by entrapment in an improperly maintained swimming-pool drain. In Abbey's memory, the Foundation works to create safer pools through public education, advocacy, and the promotion of comprehensive pool safety standards. Its initiatives include educating pool owners, operators, inspectors, families, and the general public

about drowning, entrapment, and other aquatic hazards; partnering with community officials and the pool and spa industry to improve product design, warnings, and safety practices; and advocating for stronger pool-safety laws and enforcement. The Foundation also played a leading role in advancing efforts to address pool and spa entrapment, drowning risks, and related water-safety hazards. Funds awarded to the Foundation would support this pool-specific safety work, including educational outreach, collaboration with communities and industry participants, and continued efforts to improve pool-safety standards and prevent child injuries and deaths.

2. Scope of Release.

The Release is narrowly tailored to economic loss claims arising from the alleged Defect. Settlement §§ I(45), X(4). In exchange for the benefits allowed under the Settlement, Class Members will release any and all claims, demands, rights, suits, liabilities and causes of action of every nature and description whatsoever, known or unknown, matured or unmatured, at law or in equity, existing under federal or state law, that were asserted in the Action or that could have been asserted in the Action based on the same factual predicate as the Action, arising from the purchase of a Class Product before the Preliminary Approval Date, and seeking recovery for alleged economic loss, overpayment, diminution in value, or other non-personal-injury monetary relief. *Id*. §§ I(45), VIII. Released Claims do not include: (a) personal injury, bodily injury, wrongful death, emotional distress, or mental anguish; (b) property damage; (c) insurers' subrogation claims; (d) claims based on conduct occurring after the Preliminary Approval Date; or (e) claims to enforce recall-related remedies or governmental enforcement actions. *Id*. § I(45).

3. The Notice Plan Has Been Implemented, and The Response Has Been Overwhelmingly Positive.

EisnerAmper successfully implemented the Court-approved Notice Plan, which included an extensive digital notice campaign and direct notice efforts to Class Members whose information

was reasonably available. *See* Declaration of Brandon Schwartz filed herewith ("EisnerAmper Decl.") ¶¶ 5-19. EisnerAmper's declaration details the implementation of the Notice Plan and resulting claims and class-member response to the Notice and Settlement, which has been overwhelmingly positive. As of November 12, 2026, a total of 76,662 claims have been approved or preliminarily validated, with only thirty-five (35) opt-outs and only one (1) objection. *Id.* ¶¶ 20-24. The claims process is ongoing through November 19, 2026. Dkt. No. 68. The Parties will provide updated claims data prior to or at the Final Hearing on November 20, 2026.

III. ARGUMENT

Rule 23(e) provides that "[t]he claims, issues, or defenses of a certified class may be settled, voluntarily dismissed, or compromised only with the court's approval." While "[f]ederal courts naturally favor the settlement of class action litigation[,]" *Isby v. Bayh*, 75 F.3d 1191, 1196 (7th Cir. 1996), the Court must undertake three essential tasks before granting a settlement final approval. First, a court must determine whether a proposed settlement class meets the requirements of Rule 23(a) and (b). *See Gehrich v. Chase Bank USA, N.A.*, 316 F.R.D. 215, 223 (N.D. Ill. 2016). Second, courts must confirm that notice provided to class members satisfies due process and Rule 23(e). *Schulte v. Fifth Third Bank*, 805 F. Supp. 2d 560, 595–96 (N.D. Ill. 2011). Last, a court may approve a proposed settlement "only if it determines after a hearing that the proposed settlement is 'fair, reasonable, and adequate.'" Fed. R. Civ. P. 23(e)(2). All requirements for approving the Settlement are met. Thus, the Court should grant final certification and approve the Settlement.

A. Certification of The Settlement Class is Appropriate.

Certification of a settlement class must satisfy each requirement of Rule 23(a) and one separate provision of Rule 23(b). Fed. R. Civ. P. 23(e). As detailed in Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement, (Dkt. No. 56), the Settlement Class meets

the requirements of Rules 23(a) and 23(b)(3). In the Preliminary Approval Order, the Court found, "that the Settlement Class meets all the prerequisites of Federal Rule of Civil Procedure 23 for class certification, including numerosity, commonality, typicality, predominance of common issues, superiority and that Plaintiffs and Class Counsel are adequate representatives of the Settlement Class." Dkt. No. 63 at 4. This Court should finally certify the Class for purposes of settlement because there is no reason to disturb its earlier findings, and nothing has changed since the Preliminary Approval Order. *Kolinek v. Walgreen Co.*, 311 F.R.D. 483, 490-93 (N.D. Ill. 2015).

B. The Settlement's Notice Plan Satisfies Both Rule 23(e)(1) and Due Process.

In the Preliminary Approval Order, this Court approved the proposed Class Notice Plan, which EisnerAmper implemented as ordered. *See* Dkt. No. 63, ¶ 20. When a proposed class action settlement is presented for court approval, the Federal Rules require "the best notice that is practicable under the circumstances," and that certain identified items in the notice be "clearly and concisely state[d] in plain, easily understood language." Fed. R. Civ. P. 23(c)(2)(B). The Class Notice Plan is the best notice practicable under the circumstances, and the content complies with Rule 23(c)(2)(B). The notices clearly and concisely explain the nature of the Action and the terms of the Settlement, provide a clear description of who is a member of the Settlement Class and the binding effects of Class membership, detail how to object to or exclude oneself from the Settlement, and how to contact Class Counsel. *See* Settlement, Exhibits B-D (Dkt. No. 57-1, pp. 66-83). Given the broad reach of the Notice and the comprehensive information provided to the Class, the requirements of Rule 23 and due process are easily met. EisnerAmper Decl. ¶¶ 5-19.

C. The Settlement Is Fair, Reasonable, and Adequate.

"Federal courts naturally favor the settlement of class action litigation." *Isby*, 75 F.3d at 1196. "A district court may approve a settlement of a class action if it concludes that it 'is fair, reasonable, and adequate.'" *Kaufman v. Am. Express Travel Related Servs. Co.,* 877 F.3d 276, 283

(7th Cir. 2017); Fed. R. Civ. P. 23(e)(2). For this determination, courts in the Seventh Circuit consider six factors: (1) the strength of the case for plaintiffs on the merits, balanced against the extent of settlement offer; (2) the complexity, length, and expense of further litigation; (3) the amount of opposition to the settlement; (4) the reaction of members of the class to the settlement; (5) the opinion of competent counsel; and (6) the stage of the proceedings and the amount of discovery completed. *Wong v. Accretive Health, Inc.*, 773 F.3d 859, 863 (7th Cir. 2014).

Courts must also consider the four factors in the "new version of [Fed. R. Civ. P.] 23(e)(2)," in addition to the *Wong* factors. *Snyder v. Ocwen Loan Serv., LLC*, 2018 WL 4659274, at *3 (N.D. Ill. Sept. 28, 2018). Rule 23(e)(2) requires the Court to consider whether: (A) the class representatives and class counsel have adequately represented the class; (B) the proposal was negotiated at arm's length; (C) the relief provided for the class is adequate, taking into account the (i) costs, risks, and delay of trial and appeal; (ii) the effectiveness of the proposed distribution method; (iii) the terms of any proposed attorneys' fee award; and (iv) any agreement required to be identified under Rule 23(e)(3); and (D) the proposal treats class members equitably relative to one another. The *Wong* and Rule 23(e)(2) factors may overlap or be "duplicative." *See T.K. Through Leshore v. Bytedance Tech. Co*., 2022 WL 888943, at *10 (N.D. Ill. Mar. 25, 2022) ("*T.K.*").

1. The Settlement Amount Is Reasonable in Light of The Strengths and Weaknesses of Plaintiffs' Case (*Wong* Factor 1).

"[C]ourts in the Seventh Circuit have long considered 'the strength of plaintiff's case on the merits balanced against the amount offered in the settlement' to be the 'most important factor relevant to the fairness of a class action settlement.'" *See T.K.*, 2022 WL 888943, at *12. Further, "[b]ecause the essence of settlement is compromise, courts should not reject a settlement solely because it does not provide a complete victory to the plaintiffs." *In re AT&T Mobility*, 270 F.R.D.

330, 347 (N.D. Ill. 2010). While Plaintiffs believe their case is strong, the Settlement eliminates significant risks they would face if the action were to proceed, including the complexity, length, and expense involved in product defect cases. Against these risks, the $15,000,000.00 Settlement Fund provides certain and substantial recovery without requiring the Settlement Class to prevail on contested liability, certification, and damages. Considering the substantial uncertainties associated with further litigation and the immediate monetary benefits available under the Settlement, the relief provided is fair, reasonable, and adequate. *Schulte*, 805 F. Supp. at 586.

2. Further Litigation Would Be Complex, Lengthy, and Costly (*Wong* Factor 2).

Final approval is favored because "[s]ettlement allows the case to avoid the inherent risk, complexity, time, and cost associated with continued litigation." *Schulte*, 805 F. Supp. 2d at 586. Proceeding to trial would take years and entail extensive discovery and motion practice, including a contested motion to certify the class and summary judgment motions. Rather than embarking on years of protracted and uncertain litigation, Plaintiffs and their counsel utilized the opportunity to negotiate a Settlement providing immediate, certain, and meaningful relief to the Settlement Class, which weighs in favor of the settlement. *Schulte*, 805 F. Supp. 2d at 586.

3. The Amount of Opposition to The Settlement and The Reaction to The Class (*Wong* Factors 3 and 4).

The reaction of the Class has been overwhelmingly positive. Class Counsel Decl. ¶¶ 32-35. As of the October 30, 2026, deadline there are only thirty-five (35) opt-outs among the many Pools sold, and one (1) objection, which has since been resolved. *See* EisnerAmper Decl. ¶¶ 20-24. Dkt. No. 66-1; Class Counsel Decl. ¶¶ 32-35. The lack of significant opposition reflects the overwhelming support for the Settlement. *See*, *e.g.*, *In re Cap. One Tel. Consumer Prot. Act Litig.*, 80 F. Supp. 3d 781, 792 (N.D. Ill. 2015) (finding opt-out and objection rate of 0.0032% low enough to support settlement). As detailed in the Declaration of Rachel Soffin in Response to Dkt. No. 64,

the singular objection to the Settlement was based on an incorrect concern that the Settlement would not be enough to cover funeral costs if a Class Member lost a child because of the alleged Defect. *See* Dkt. No. 66-1. This concern was promptly addressed with the objector and resolved by Class Counsel as the Settlement specifically excludes claims for "personal injury, bodily injury, wrongful death, emotional distress, or mental anguish." *See* Settlement, Dkt. No. 61-1, § I ¶ 45(a).

4. Competent Class Counsel Endorse the Settlement (*Wong* Factor 5).

Class Counsel are highly experienced class action attorneys who engaged in extensive, arm's-length negotiations, and were armed with knowledge learned through discovery, investigation, and their own experts, which helped them evaluate the benefits of the proposed Settlement. *See* Class Counsel Decl. ¶¶ 2, 36-8; *see also* Dkt. No. 31-1. That Class Counsel has consistently achieved final approval in similar settlements reinforces their endorsement of the Settlement as being in the best interests of the class and is a strong indicator that the settlement is fair, reasonable, and adequate. *See*, *e.g.*, *Snyder*, 2019 WL 2103379, at *6 ("Class counsel are experienced members of the plaintiff's consumer class action bar. They favor the settlement, and this is a factor supporting approval of the amended settlement."); Class Counsel Decl. ¶ 38.

5. The Proceedings Advanced Far Enough to Allow The Parties to Responsibly Resolve the Case (*Wong* Factor 6).

This factor concerns the stage of the proceedings, and the amount of discovery completed at the time the settlement is reached. *Am. Int'l Grp., Inc. v. ACE INA Holdings, Inc.*, 2011 WL 3290302 (N.D. Ill. July 26, 2011) (citation modified). Before mediation, the Parties exchanged significant confidential discovery to thoroughly understand the strengths and weaknesses of their case. Class Counsel Decl. ¶ 15. Additionally, the Parties engaged in multiple mediation sessions with the Honorable Diane Welsh, a highly respected former federal judge, where a critical analysis of the Parties' positions was conducted. *Id.* ¶¶ 16-17. The mediations and subsequent negotiations

to finalize the Settlement allowed both sides to evaluate the potential outcomes of continued litigation versus the certainty provided by the Settlement. *Id.* ¶ 18.

6. The Class Representatives and Plaintiffs' Counsel Have Adequately Represented the Class (Rule 23(e)(2)(A)).

Here, both Class Counsel and Class Representatives have participated in the case diligently, as reflected in the significant achievement of the Settlement, and the litigation of this Action. *See* Class Counsel Decl. ¶¶ 36-41. The breadth of Class Counsel's investigation, informal discovery, and hard-fought negotiations performed before the Settlement was entered into ensured that Plaintiffs and Class Counsel made informed decisions to approve and recommend the Settlement to the Class and the Court. *Id*. ¶ 39. In the Preliminary Approval Order, the Court found that this element was satisfied, and the adequacy requirement remains satisfied as Class Counsel and Class Representatives have continued to adequately represent the Settlement class. *See* Dkt. No. 63 ¶¶ 8-9. Class Counsel have expressed their support for the Settlement and believe, based on their extensive class action experience and exhaustive pursuit of Plaintiffs' claims, that the Settlement is an outstanding result for the Class Members. Class Counsel Decl. ¶¶ 39-40.

7. The Settlement Was Negotiated at Arm's Length (Rule 23(e)(2)(B)).

The Settlement was negotiated at arm's length over many months and with the assistance of Judge Welsh, serving as a mediator at multiple mediation sessions. *Id.* ¶¶ 16-17. *See T.K.*, 2022 WL 888943, at *11 ("The best evidence of a 'truly adversarial bargaining process' is the 'presence of a neutral third-party mediator.'").

8. The Settlement Provides Adequate Relief to The Class (Rule 23(e)(2)(C)).

Whether relief is adequate considers "(i) the costs, risks, and delay of trial and appeal; (ii) the effectiveness of any proposed method of distributing relief to the class, including the method of processing class-member claims, if required; (iii) the terms of any proposed award of attorney's

fees, including timing of payment; and (iv) any agreement required to be identified under Rule 23(e)(3)." Fed. R. Civ. P. 23(e)(2)(C). Shown below, each of these factors supports final approval.

i. The Costs, Risks, and Delay of Trial and Appeal.

This factor overlaps with *Wong* factor 2. For the reasons stated above, the Settlement meets this factor. Argument § III.C.2.

ii. The Effectiveness of Any Proposed Method of Distributing Relief to The Class.

To make a claim, a claimant needed only to provide basic information to receive a Cash Payment, and the Settlement also allows for payments provided electronically or in a single check. *See, e.g.*, *Kolinek*, 311 F.R.D. at 499 (holding it was "neither unfair nor unreasonable" to ask claimants to submit a "short and direct" claim form that required claimants to provide their names, address, and signature, and to check a box if they wished to make a claim); *T.K.*, 2022 WL 888943, at *14 ("A requirement that potential claimants 'fill out a form in order to collect from the settlement fund' seldom raises such concerns."). Settlement § V.11. The claims process is also designed to facilitate participation by purchasers who may no longer possess receipts or other proof of purchase, which is particularly important given the age of some affected Pool models.

iii. The Terms of Any Proposed Fee Award, Including Timing of Payment.

Class Counsel separately moved for an award of attorneys' fees, reimbursement of litigation expenses, and Service Awards on September 25, 2026. Dkt. No. 65-1 ("Fee and Costs Motion"). As detailed in that motion, Class Counsel devoted significant time to this litigation, excluding time spent preparing the fee motion. The reasonableness of the requested award, including the applicable lodestar and multiplier, is addressed in the separately filed Fee and Costs Motion. Dkt. No. 65. Given the number of claims continuing to be submitted by Settlement Class Members, the Claims Deadline was extended to November 19, 2026. Dkt. No. 68. Allowing

Settlement Class Members an expanded opportunity to participate in the Settlement increased the administrative costs from $380,521.00 (the amount at the time Class Counsel filed their Fee and Costs Motion) to $430,000.00, which remains less than the notice and administrative costs originally estimated at $437,770.00. *See* EisnerAmper Decl. ¶ 28.

Plaintiffs petitioned this Honorable Court for attorneys' fees of one-third (i.e., 33.333…%) of the Net Settlement Fund ($15,000,000.00 less notice and administration costs and Service Awards). Dkt. No. 65. Given the slight increase in administrative costs, and that notice and administrative costs are not being included in Plaintiffs' request for one-third of the Net Settlement Fund, Plaintiffs fee request is slightly reduced from $4,867,326.33 to $4,850,338.00 ($15,000,000.00 less the $430,000.00 in notice and administrative costs and $17,500.00 in requested Service Awards for all seven (7) Plaintiffs, which equals a net settlement fund of $14,552,500.00, slightly less than one-third of which is $4,850,338.00). This reduced amount is reflected in the Proposed Order granting Final Approval of Class Action Settlement. Class Counsel also seek reimbursement for costs and expenses incurred in the prosecution of this Action in the amount of $41,864.18. The proposed fee award remains subject to the Court's independent review and approval. Class Counsel respectfully submit that the requested award is reasonable in light of the monetary benefit obtained, the contingent nature of the representation, and the risks undertaken in pursuing this Action.

iv. There Are No Agreements between The Parties Other Than the Settlement.

Under Rule 23(e)(2)(C)(iv), the Court should consider any agreements between the parties. Here, the Parties have made no agreements beyond the proposed Settlement.

D. The Settlement Treats All Class Members Equally (Rule 23(e)(2)(D)).

The Pools range in price from approximately $400.00 to over $1,000.00. Class Members

submitting Valid Proof of Purchase are eligible to receive a Cash Payment equal to ten percent (10%) of either: (i) the actual purchase price as reflected in the Valid Proof of Purchase (*e.g.*, receipt); or (ii) if the Valid Proof of Purchase does not reflect the actual purchase price, the Average Retail Price assigned to the identified Class Product in the product pricing schedule. Class Members without Valid Proof of Purchase are eligible for a $40.00 Cash Payment. This distinction reasonably accounts for differences in the documentation available to verify purchases while preserving a meaningful avenue for recovery by purchasers who do not have proof of purchase. *See Woodard v. Labrada*, 2023 WL 11938015, at *3 (C.D. Cal. Jan. 9, 2023) (granting final approval to class settlement where class members with proof of purchase were eligible to receive more compensation than claimants without proof of purchase). Thus, the Settlement establishes an objective and reasonable basis for allocating relief among participating Class Members.

IV. CONCLUSION

For the foregoing reasons, Plaintiffs respectfully request that the Court: (1) grant final approval of the Settlement as fair, reasonable, and adequate under Federal Rule of Civil Procedure 23(e)(2); (2) finally certify the Settlement Class for settlement purposes under Rules 23(a) and 23(b)(3); (3) find that the Notice Plan satisfied Rule 23 and due process; (4) overrule the objection to the extent it remains pending; and (5) grant Plaintiffs' separately filed motion for attorneys' fees, reimbursement of litigation expenses, and Service Awards. Dkt. No. 65.

Respectfully submitted this 13th day of November, 2026.

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Additional Class Counsel
and Plaintiffs' Executive Committee

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

IN RE: BESTWAY ABOVE-GROUND POOLS LITIGATION	Case No. 1:25-cv-09570 Judge: Honorable Lindsay C. Jenkins

CLASS COUNSEL'S JOINT DECLARATION IN SUPPORT OF PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

We, Rachel Soffin and Kevin Laukaitis, declare as follows:

1. Following transfer and consolidation of this Action brought by Plaintiffs Susana Castro, Pete Piceno, Shannon Gannon, Leah Holloway, Jamie DeSabio, Katrina Hill and Lisa Weeks (collectively, "Plaintiffs" or "Class Representatives"), on November 12, 2025, the Court appointed the undersigned (Rachel Soffin of Pearson Warshaw, LLP and Kevin Laukaitis of Laukaitis Law LLC) as Interim Co-Lead Counsel on behalf of the putative classes. *See* Dkt. No. 33.

2. Ms. Soffin and Mr. Laukaitis make this Declaration in support of Plaintiffs' Motion for Final Approval of Class Action Settlement filed concurrently herewith. We have personal knowledge of the matters addressed in this Declaration and could testify competently as to these facts if called upon to do so.

3. Our firm resumes are attached to this Declaration as Exhibit A (Pearson Warshaw, LLP) and Exhibit B (Laukaitis Law LLC).

Overview of the Action

4. On May 4, 2026, the Court entered an Order granting Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement and appointed the undersigned counsel to act as Settlement Class Counsel and also appointed additional counsel to the Executive Committee: Leslie Pescia of Siri Glimstad, Nick Suciu of Bryson Harris Suciu & DeMay PLLC, Charles D. Moore of Reese LLP, Jason Sultzer of Sultzer & Lipari, PLLC and Alec Schultz of Hilgers Graben PLLC. *See* Preliminary Approval Order ("Preliminary Approval Order") (Dkt. No. 63).

5. Prior to the Preliminary Approval Order, beginning in August 2025, four putative class action complaints were filed against Defendants Bestway (USA) Inc. ("Bestway USA"), Bestway Inflatables & Material Corp. ("Bestway Inflatables"), and Bestway (Hong Kong) International Ltd ("Bestway Hong Kong") (collectively "Bestway" or "Defendants") in various federal courts around the country. Plaintiffs alleged generally that Defendants manufactured, distributed and sold certain Bestway-branded above-ground Pools from 2008 to 2024 that were 48 inches in height or taller, that contained a uniform Defect—compression straps located outside of the pool legs that may create a foothold, which could allow a child to gain access to the pool and create a potential drowning hazard (the "Defect"). Further, Plaintiffs alleged that Defendants issued a recall in conjunction with the Consumer Product Safety Commission, which Plaintiffs allege was delayed, deficient, and inadequate, including that it failed to offer any monetary relief ("Recall" or "Pool Recall").

6. On August 12, 2025, Plaintiff Castro filed a putative class action against Bestway USA in the United States District Court for the Northern District of Illinois. *Castro v. Bestway (USA) Inc.*, No. 1:25-cv-09570 (N.D. Ill.) (the "*Castro* Action").

7. On August 21, 2025, Plaintiffs Pete Piceno and Shannon Gannon filed a putative class action against Defendants in the United States District Court for the Central District of California. *Piceno et al. v. Bestway USA, Inc*. et al., No. 1:25-cv-12315 (C.D. Cal.) (the "*Piceno* Action").

8. On October 17, 2025, Plaintiffs Katrina Hill and Lisa Weeks filed a putative class action against Bestway USA in the United States District Court for the Northern District of California. *Hill et al. v. Bestway (USA) Inc*., No. 1:25-cv-13422 (N.D. Cal.) (the "*Hill* Action").

9. On October 21, 2025, Plaintiff Leah Holloway filed a related putative class action against Defendants in the Northern District of Illinois. *Holloway v. Bestway USA, Inc*. et al., No. 1:25-cv-12853 (N.D. Ill.) (the "*Holloway* Action").

10. On October 3, 2025, the *Piceno* Action was transferred to the Northern District of Illinois. On October 22, 2025, the *Piceno* Action was related to the *Castro* Action. On October 29, 2025, the *Hill* Action was transferred to the Northern District of Illinois.

11. On November 6, 2025, the Court held an initial status conference. Following that conference, the Court consolidated the related cases into a single action styled: *In re: Bestway Above-Ground Pools Litigation*, No. 1:25-cv-09570 (N.D. Ill.) (the "Action"). Dkt. No. 30.

12. On November 7, 2025, Plaintiffs moved for the appointment of interim class counsel. Dkt. No. 31. The Court granted that motion on November 12, 2025, appointing Kevin Laukaitis of Laukaitis Law LLC and Rachel Soffin of Pearson Warshaw, LLP as Interim Co-Lead Class Counsel and appointing additional counsel to the Executive Committee, including Leslie Pescia of Siri Glimstad, Nick Suciu of Bryson Harris Suciu & DeMay PLLC, Charles D. Moore of Reese LLP, Jason Sultzer of Sultzer & Lipari, PLLC, and Alec Schultz of Hilgers Graben PLLC. Dkt. No. 33.

13. On November 24, 2025, Plaintiffs filed a Consolidated Amended Class Action Complaint, alleging claims on behalf of consumers nationwide. Dkt. No. 37. Plaintiff DeSabio was included in the Consolidated Amended Class Action Complaint as a Plaintiff in the Action.

14. Class Counsel began investigating the Pools and the Recall before the initial complaints were filed. Our investigation included reviewing product materials, reported incidents, prior litigation records, and recall information, consulting with experts, and interviewing potential Class Members. See Dkt. No. 31. This work enabled us to evaluate the alleged Defect, the adequacy of the Recall, the potential economic injury to purchasers, and the legal and factual risks associated with pursuing the claims. Together with the information subsequently obtained from Defendants, these efforts provided a substantial factual basis for evaluating the proposed Settlement.

Overview of Settlement Discussions

15. Following Plaintiffs' substantial investigation and consolidation of the Action, the Parties began discussing a potential settlement. Prior to mediation, the Parties exchanged significant confidential informal discovery, including documents and information sufficient to identify all Pool model numbers, brand names, product descriptions, retail pricing information, supply dates, number of Pool units sold, design changes made to the Pools consistent with industry standards, packaging information, user manuals, testing regarding evaluation of the repair kit subject to the Pool Recall and related Pool Recall data, as well as Plaintiffs' Pool purchase information and documentation. This information allowed the Parties to evaluate the strengths and weaknesses of the claims and negotiate an informed resolution. The Parties also exchanged detailed mediation briefs prior to mediation, outlining their respective positions.

16. On January 16, 2026, the Parties participated in a full-day, in-person mediation before the Honorable Diane Welsh (Ret.) of JAMS in Philadelphia, Pennsylvania. The mediation was hard-fought and conducted at arm's length. Although the mediation was not successful, it laid the groundwork for further settlement discussions and a second mediation.

17. On February 13, 2026, the Parties subsequently participated in a second full-day in-person mediation session before Judge Welsh in Philadelphia, Pennsylvania. At that session, the Parties reached an agreement in principle to resolve the Action on a nationwide class basis.

18. The January 16 and February 13, 2026, mediation sessions allowed both sides to fully evaluate the potential outcomes of continued litigation versus the certainty provided by the Settlement. During settlement negotiations with Defendants at mediation, the Parties debated many issues and negotiated many terms of the Settlement, including the amount and forms of payment and relief. During these negotiations, there was no collusion or preference among counsel for the settling Parties at any time. The negotiations were contentious, hard-fought, and fully informed. Plaintiffs and Class Counsel sought to obtain the greatest monetary benefit possible from Defendants and concluded that the proposed Settlement was in the best interest of the Class. Based on our investigation, review of the information exchanged, and experience litigating consumer class actions, we concluded that the substantial and certain benefits of the proposed Settlement compare favorably with the risks, expenses, and delays of proceeding through contested class certification, dispositive motions, trial, and potential appeal.

19. The Parties notified the Court of the agreement in principle to resolve the Action on a nationwide class basis via a joint status report on February 19, 2026. Dkt. No. 43.

20. Over approximately the next two months, the Parties continued to negotiate the finer points of the Settlement Agreement, including the terms of the Release, the Settlement

Administrator and its respective duties, the Notice Plan and the proposed schedule of settlement events. The Parties did not discuss attorneys' fees, costs or service awards until after agreement was reached on the material terms of class relief. No agreements have been made in connection with the proposed Settlement other than the Settlement Agreement presented to the Court.

The Settlement's Proposed Benefits

21. The Settlement Agreement between the Parties is attached to Plaintiffs' Motion for Preliminary Approval of Class Action Settlement as Exhibit 1. *See* Dkt. No. 61-1.

22. The Settlement Class is defined as follows:

> All Persons in the United States (including states, districts, territories, and tribal reservations) who purchased a Class Product, for personal use and not for resale, before the date of the Preliminary Approval Order.

23. Expressly excluded from the Settlement Class are:

> (1) the presiding judge and immediate family; (2) Defendants and their respective parents, subsidiaries, affiliates, and their current and former officers, directors, employees, agents, and counsel; (3) Persons who timely and properly Opt-Out; (4) successors/assigns of excluded Persons; (5) wholesalers, distributors, or retailers of the Class Products; (6) second-hand purchasers; (7) any federal, state, or local government entity; and (8) Class Counsel.

24. Defendants will pay $15,000,000.00 to create a non-reversionary Settlement Fund for Settlement Class Members who will receive a Cash Payment for filing a Valid Claim.

25. The Settlement provides a fair, reasonable and adequate resolution to the claims of this Action—providing Settlement Class Members with Valid Proof of Purchase a Cash Payment equal to ten percent (10%) of either: (i) the actual price paid as reflected in the Valid Proof of Purchase (e.g., receipt); or (ii) if the Valid Proof of Purchase does not reflect the actual purchase price, the Average Retail Price assigned to the identified Class Product in the product pricing schedule, and providing Settlement Class Members without Valid Proof of Purchase a Cash

Payment of $40.00, which is 10% of the $400 base price of the Pools. This is an excellent result for consumers.

26. The Settlement Agreement provides for *pro rata* adjustments to Cash Payments depending on the amount available for distribution following approved deductions from the Settlement Fund. If funds remain after calculation of the initial Cash Payments, participating Settlement Class Members may receive an additional *pro rata* distribution, subject to the limitations established in the Settlement Agreement.

27. The Settlement Agreement provides that, subject to Court approval, residual funds remaining after the distributions required by the Agreement may be distributed to Court-approved *Cy Pres* Recipients. The proposed recipients are Saved by Luke, Boys and Girls Club of Chicago (Aquatics Department), and Abbey's Hope. These organizations were identified for their work in youth life-saving swim instruction, water safety, drowning prevention and education for parents, caregivers, and communities about drowning risks and survival swim instruction.

28. To the best of our knowledge, following reasonable inquiry, neither Defendants nor their counsel, Plaintiffs, Class Counsel, or the Class Representatives have any financial interest in, or organizational affiliation with, the proposed *Cy Pres* Recipients that would create a conflict of interest regarding their selection or receipt of Settlement funds.

Notice and Claims Administration

29. The claims process is ongoing through November 19, 2026. The Parties have provided current claims data as of November 12, 2026, and will provide updated claims data prior to or at the Final Hearing on November 20, 2026.

30. Pursuant to the Settlement Agreement, EisnerAmper LLP ("EisnerAmper"), an experienced third-party Settlement Administrator, executed the Notice Plan in accordance with the

Preliminary Approval Order, and is overseeing the claims submission and review process. *See* Decl. of Brandon Schwartz of EisnerAmper Regarding Notice Plan and Settlement Administration filed on April 30, 2026, Dkt. No. 58 ¶¶ 9-10.

31. Pursuant to the Court-approved Notice Plan, EisnerAmper implemented a notice program that included targeted digital advertising, social media and programmatic display advertising, a press release, and direct notice by email or U.S. Mail where reasonably available contact information could be obtained. The Notice Plan was designed to reach potential Settlement Class Members through multiple channels. The specific implementation measures, number of impressions, estimated reach, and results of the Notice Plan are addressed in the Declaration of Brandon Schwartz of EisnerAmper in support of Plaintiffs' Motion for Final Approval filed herewith ("EisnerAmper Decl.") ¶¶ 5-19.

32. Although the Court-approved claims process is ongoing, it is clear that the Settlement represents an outstanding result for the Class and warrants final approval. Settlement Class Members had until October 30, 2026, to file objections or opt-out requests. To date, only one (1) timely objection has been filed and only thirty-five (35) timely and valid requests for exclusion.

33. In accordance with Section V.18(d) of the Settlement Agreement, EisnerAmper has prepared a list identifying all Persons who timely and validly requested exclusion from the Settlement Class ("Opt-Out List") and provided it to Class Counsel. A fully redacted version of the Opt-Out List is attached as Exhibit H to the EisnerAmper Declaration. Plaintiffs are concurrently moving for leave to file an unredacted version of the Opt-Out List under seal pursuant to Section V.18(d) of the Settlement Agreement.

34. The singular objection to the Settlement filed (Dkt. No. 64), which Plaintiffs quickly responded to (Dkt. No. 66), was based on a concern that the Settlement would not be

enough to cover funeral costs if a Class Member lost a child because of the alleged hazard relating to the Pool. *See* Dkt. No. 66-1. However, this concern was based on an incorrect understanding of the Settlement, which states that the Settlement of this proposed consumer protection class action specifically excludes claims for "personal injury, bodily injury, wrongful death, emotional distress, or mental anguish." *See* Settlement Agreement, Dkt. No. 61-1, § I ¶ 45(a). As detailed in the Declaration of Rachel Soffin in Response to Docket No. 64, this objection was promptly addressed, and the incorrect understanding of the Settlement was resolved by Class Counsel. Dkt. No. 66-1. Because the sole objection was based on a misunderstanding of the scope of the Settlement's release, the limited number of objections supports final approval of the Settlement.

35. Therefore, Class Members have received notice and an opportunity to be heard, and their reaction is highly favorable.

The Settlement is Fair, Reasonable, and Adequate

36. The Settlement was negotiated over the course of several months, at arm's length by competent, experienced counsel, with the assistance of a highly regarded mediator, Judge Diane Welsh. Given the substantial risks associated with class certification, liability and damages, the Settlement falls well within the range of possible approval under Rule 23(e).

37. Class Counsel conducted a thorough investigation before reaching the proposed Settlement, including consulting with experts, reviewing product materials, reported incidents and prior litigation records, interviewing potential Class Members, and exchanging substantial informal discovery with Defendants before mediation. These efforts provided Class Counsel with sufficient information to evaluate the strengths and weaknesses of the claims and negotiate an informed resolution.

38. Class Counsel have significant experience in the litigation, certification, and settlement of class actions, including numerous claims involving product defects and mislabeling, and have recovered hundreds of millions of dollars for the classes we have represented. The experience, resources, and knowledge that we bring to this Action are extensive and formidable. See Exhibits A and B attached hereto.

39. Based on our investigation and evaluation of the claims, we identified substantial risks associated with continued litigation. These included proving that the alleged design defect supported actionable economic loss claims across the affected Pool models; establishing the nature and amount of any diminution in value or other recoverable economic injury; addressing the effect of the Recall and proposed remedy; and obtaining contested class certification in an action involving purchasers across multiple jurisdictions. These risks materially informed us of the appropriate settlement value.

40. In our judgment, the $15,000,000.00 non-reversionary Settlement Fund constitutes a substantial recovery in light of the risks identified above. Defendants deny liability and, absent settlement, would contest Plaintiffs' claims and class certification. We considered both the possibility of a greater recovery through continued litigation and the meaningful possibility that the Class would recover substantially less or nothing at all. Based on the information available to us, we concluded that the certainty and value of the Settlement justified recommending its approval.

41. The Class Representatives assisted Class Counsel in investigating and prosecuting this Action by providing information concerning their purchases of the affected Pools, their experiences with the Pools and Recall, and documentation relevant to their claims. They also communicated with Class Counsel concerning the litigation and proposed resolution. Their

participation helped us evaluate the claims and negotiate the Settlement. We believe the Class Representatives adequately represented the interests of the Settlement Class throughout the Action.

42. Finally, there are no conflicts between the Settlement Class Representatives and other Settlement Class Members. Rather, Settlement Class Representatives' claims are substantially similar to the claims of the other Settlement Class Members. Moreover, in crafting the Settlement, we took care to ensure that the relief was allocated equitably among all Settlement Class Members. Also, there is no agreement between the Parties other than the Settlement itself.

43. In our opinion, based on substantial experience as outlined herein, the Settlement is fair, reasonable and adequate and warrants the Court's final approval. Additionally, the Settlement is an outstanding result for the Settlement Class.

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

Executed this 13th day of November, 2026.

By: */s/ Rachel Soffin*
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Court-Appointed Co-Lead Class Counsel

E HIBIT A

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Pearson Warshaw, LLP ("PW") is a civil litigation firm with offices in Los Angeles, San Francisco and Minneapolis. PW is AV-rated by Martindale and ranked by Chambers and Partners. The firm specializes in complex litigation, including state coordination cases and federal multidistrict litigation. Its attorneys have extensive experience in antitrust, securities, consumer protection, and unlawful employment practices. The firm handles national and multinational class actions that present cutting-edge issues in both substantive and procedural areas. PW attorneys understand how to litigate difficult and large cases in an efficient and cost-effective manner, and they have used these skills to obtain outstanding results for their clients, both through trial and negotiated settlement. They are recognized in their field for excellence and integrity and are committed to seeking justice for their clients.

CASE PROFILES

PW attorneys *currently* hold, or have held, a leadership role in the following representative cases:

NOTABLE CASES

In re National Collegiate Athletic Association Athletic Grant-in-Aid Cap Antitrust Litigation, Northern District of California, MDL No. 2451. PW attorneys served as co-lead counsel in this multidistrict litigation alleging that the NCAA and its member conferences violated the antitrust laws by restricting the value of grant-in-aid athletic scholarships and other benefits that college football and basketball players could receive. The damages portion of the case settled for $208 million, while the injunctive relief phase of the case proceeded to a successful bench trial before ultimately concluding with a 9-0 victory before the Supreme Court of the United States. *See at l Collegiate Athletic Ass n v. Alston*, 594 U.S. 69 (2021).

In re Credit Default Swaps Antitrust Litigation, Southern District of New York, MDL No. 2476. PW attorneys served as co-lead counsel and represented the Los Angeles County Employees Retirement Association ("LACERA") in a class action on behalf of all purchasers and sellers of Credit Default Swaps ("CDS") against twelve of the world's largest banks. The lawsuit alleged that the banks, along with other defendants who controlled the market infrastructure for CDS trading, conspired for years to restrain the efficient trading of CDS, thereby inflating the cost to trade

CDS. The alleged antitrust conspiracy resulted in billions of dollars in economic harm to institutional investors such as pension funds, mutual funds, and insurance companies who used CDS to hedge credit risks on their fixed income portfolios. After nearly three years of litigation and many months of intensive settlement negotiations, PW helped reach a settlement with the defendants totaling $1.86 *billion* plus injunctive relief. On April 15, 2016, the Honorable Denise L. Cote granted final approval to the settlement, which is one of the largest civil antitrust settlements in history.

Senne v. Office of the Commissioner of Baseball, Northern District of California, Case No. 14-cv-00608. PW attorneys currently serve as co-lead counsel in this certified class action and FLSA collective action on behalf of minor league baseball players who allege that Major League Baseball and its member franchises violate the FLSA and state wage and hour laws by failing to pay minor league baseball players minimum wage and overtime. On March 29, 2023, the court granted final approval to a historic $185 million settlement.

In re TFT-LCD (Flat Panel) Antitrust Litigation, Northern District of California, MDL No. 1827. PW served as co-lead counsel for the direct purchaser plaintiffs in this multidistrict litigation arising from the price-fixing of thin film transistor liquid crystal display ("TFT-LCD") panels. Worldwide, the TFT-LCD industry is a multi-billion-dollar industry, and many believe that this was one of the largest price-fixing cases in the United States. PW helped collect over $405 million in settlements before the case proceeded to trial against the last remaining defendant, Toshiba Corporation and its related entities. PW partner Bruce L. Simon served as co-lead trial counsel, successfully marshaled numerous witnesses, and presented the opening argument. On July 3, 2012, PW obtained a jury verdict of $87 million (before trebling) against Toshiba. PW later settled with Toshiba and AU Optronics to bring the total to $473 million in settlements. In 2013, California Lawyer Magazine awarded Mr. Simon a California Lawyer of the Year Award for his work in the -*LC* case.

In re Potash Antitrust Litigation (No. II), Northern District of Illinois, MDL No. 1996. PW partner Bruce L. Simon served as co-lead counsel for the direct purchaser plaintiffs in this multidistrict litigation arising from the price-fixing of potash sold in the United States. After the plaintiffs defeated a motion to dismiss, the defendants appealed, and the Seventh Circuit Court of Appeals agreed to hear the case *en banc*. Mr. Simon presented oral argument to the *en banc* panel and achieved a unanimous 8-0 decision in his favor. The case resulted in $90 million in settlements for the direct purchaser plaintiffs, and the Court's opinion is one of the most significant regarding the scope of international antirust conspiracies. *See Minn-Che , Inc. v. Agriu Inc.*, 683 F. 3d 845 (7th Cir. 2012).

PW
PEARSON WARSHAW

In Re Fairlife Milk Products Marketing And Sales Practices Litigation, Northern District of Illinois, MDL No. 2909. PW partner Melissa S. Weiner served as co-lead counsel for a class of purchasers of fairlife brand milk products who were allegedly subjected to false and misleading representations regarding the treatment of the dairy cows. In 2022, the court granted final approval of a landmark $21 million settlement, which also provided for meaningful stipulated injunctive relief.

CURRENT CASES

In Re: Shell Eggs Antitrust Litigation, Western District of Wisconsin, Case No. 1:26-cv-3175-jdp. PW partner Bobby Pouya currently serves as co-lead counsel for Indirect Consumer Plaintiffs. This antitrust class action lawsuit alleges that egg producers conspired to fix, raise, and stabilize the price of conventional shell eggs sold in the United States since at least January 2022, causing consumers to pay artificially inflated prices.

Redner's Markets, Inc. v. Lamb Weston Holdings, Inc., Northern District of Illinois, Case No. 1:24-cv-11801. PW attorneys currently serve as co-lead counsel for Indirect Commercial and Institutional Purchaser Plaintiffs. This antitrust class action lawsuit was brought on behalf of purchasers of frozen potato products—including french fries, hash browns, and tater tots—and alleges a conspiracy among the largest potato processors in North America.

In re PVC Pipe Antitrust Litigation, Northern District of Illinois, Case No. 1:24-cv-07639. PW attorneys currently serve as co-lead class counsel on behalf of End-User Plaintiffs. The complaint alleges that prices for PVC pipes were artificially inflated because of a conspiracy between the price reporting service, Oil Price Information Service ("OPIS"), and the largest manufacturers of PVC pipes.

Blue Cross Blue Shield Antitrust Litigation, PW attorneys currently represent plaintiffs in opt-out cases against Blue Cross and Blue Shield entities. The complaints allege that defendants conspired to divide the country into exclusive service areas, agreeing not to compete with each other. These opt-out plaintiffs allege that the conspiracy violated antitrust laws, which led to increased insurance costs and reduced reimbursements for healthcare providers. By allocating territories and restricting competition, defendants are accused of paying healthcare providers far less than they would have received in a competitive market.

In re Episource LLC Data Breach Litigation, Central District of California, Case No. 2:25-cv-05330-SB. PW partner Daniel L. Warshaw serves as liaison counsel in this data breach class action. The complaint alleges that defendants failed to properly protect plaintiffs' personally identifying information and protected health information that was ultimately stolen by cybercriminals.

PW
PEARSON WARSHAW

In re Broiler Chicken Antitrust Litigation, Northern District of Illinois, Case No. 1:16-cv-08637. PW attorneys currently serve as co-lead class counsel on behalf of a certified class of direct purchaser plaintiffs. The complaint alleges that the nation's largest broiler chicken producers violated antitrust laws by limiting production and manipulating the price indices. PW and co-counsel secured settlements of over $284 million for the direct purchaser plaintiffs.

In re Pork Antitrust Litigation, District of Minnesota, Case No. 0:18-cv-01776. PW attorneys currently serve as co-lead class counsel on behalf of a certified class of direct purchaser plaintiffs. The complaint alleges that the nation's largest pork producers violated antitrust laws by limiting production and manipulating the price indices. Thus far, PW and co-counsel have secured over $180 million in settlements for the direct purchaser plaintiffs.

Vakilzadeh v. The Trustees of The California State University, Los Angeles County Superior Court, Case No. 20STCV23134. PW partner Daniel L. Warshaw serves as co-lead counsel for a certified class of California State University students who were not provided refunds of tuition and fees after CSU closed all campuses and ended in-person learning and activities.

In re MOVEit Customer Data Security Breach Litigation, District of Massachusetts, Case No. 1:23-md-03083-ADB. In this multidistrict cybersecurity litigation involving hundreds of defendants and an estimated 40 million people, PW partner Melissa S. Weiner currently serves as Co-Chair of the Offensive and Third-Party Discovery Committee.

In re Santa Fe Natural Tobacco Company Marketing, Sales Practices, and Products Liability Litigation, District of New Mexico, Case No. 1:16-md-02695-JB-LF. PW partner Melissa S. Weiner chairs the Executive Committee and PW partner Daniel L. Warshaw serves on the executive committee. This certified class action alleges that defendants' "natural," "organic" and "additive free" claims on their tobacco products were false and misleading to consumers.

In Re: Change Healthcare, Inc. Customer Data Security Breach Litigation, District of Minnesota, Case No. 0:24-md-03108-DWF-DJF. PW partner Melissa S. Weiner was appointed Co-Chair of the Plaintiff Steering Committee in this nationwide data breach MDL.

In re Passenger Vehicle Replacement Tires Antitrust Litigation, Northern District of Ohio, Eastern Division, Case No. 5:24-md-3107-SL. PW partner Bobby Pouya serves as a representative on the Direct Purchaser Plaintiffs' Steering Committee. This class action alleges that the world's largest tire manufacturers of new

replacement tires for passenger vehicles violated antitrust laws by raising and maintaining prices at artificially high levels in the United States.

Conry v. Gerber Products Company, et al., Eastern District of New York, Case No. 1:24-cv-06784. PW partners Daniel L. Warshaw and Bobby Pouya represent Plaintiffs in this proposed class action against infant formula manufacturers Gerber and Perrigo, which was filed on grounds that the corporations unlawfully colluded to inflate the prices of store-brand infant formula. The complaint alleges that both companies violated antitrust laws by orchestrating a scheme that restricted open-market competition. More specifically, Gerber is alleged to have granted Perrigo the "first right of refusal" on its surplus formula.

In Re: Shale Oil Antitrust Litigation, District of New Mexico (Albuquerque), Case No. 1:24-MD-03119. On August 1, 2024, a U.S. judicial panel said that a series of related lawsuits accusing shale oil producers of a price-fixing scheme would be grouped together and assigned to a U.S. federal judge in New Mexico. The order by the federal Judicial Panel on Multidistrict Litigation designated the New Mexico federal court over other venues, including Texas and Nevada, where lawsuits had been filed in recent months. More than a dozen lawsuits allege that shale oil producers conspired to curb shale oil output, which has led to higher prices for products including gasoline, diesel fuel, commercial marine fuel, and heating oil. PW partners Daniel L. Warshaw and Bobby Pouya represent Plaintiff Richard Beaumont in the case of *Beau ont v. Per ian Resources Corp.,* District of New Mexico (Albuquerque), Case No. 1:24-CV-00857.

PAST CASES

North American Soccer League, LLC v. United States Soccer Federation, Inc., and Major League Soccer, L.L.C., Eastern District of New York, Case No. 1:17-cv-05495-HG. PW, along with co-counsel, represented the North American Soccer League in a matter against the United States Soccer Federation and Major League Soccer alleging antitrust violations. The complaint alleged that U.S. Soccer and MLS prevented NASL from competing against MLS (the sole Division I league) and the United Soccer League (the sole Division II league). The matter was tried before a jury in January.

Gupta v. Aeries Software, Inc., Central District of California, Case No. 8:20-cv-00995-FMO. PW partner Daniel L. Warshaw served as class counsel in this nationwide data breach class action involving the unauthorized access to defendant's servers that stored student data.

Grace v. Apple, Inc., Northern District of California, Case No. 5:17-CV-00551-LHK. PW partner Daniel L. Warshaw served as class counsel in this California certified class action on behalf of consumers who allege Apple intentionally broke its

"FaceTime" video conferencing feature for Apple iPhone 4 or iPhone 4S users operating on iOS 6 or earlier. PW and co-counsel obtained final approval of an $18 million settlement in this matter.

In re Lithium Ion Batteries Antitrust Litigation, Northern District of California, MDL No. 2420. PW served as co-lead counsel for the direct purchaser plaintiffs in this multidistrict antitrust class action alleging price-fixing of lithium ion battery cells. PW and co-counsel secured final approval of over $139 million in settlements for the direct purchaser plaintiffs.

In re Keurig Green Mountain Single-Serving Coffee Antitrust Litigation, Southern District of New York, MDL No. 2542. In June 2014, Judge Vernon S. Broderick appointed PW to serve as interim co-lead counsel on behalf of indirect purchaser plaintiffs in this multidistrict class action litigation. The case arose from the alleged unlawful monopolization of the United States market for single-serve coffee packs by Keurig Green Mountain, Inc. Keurig's alleged anticompetitive conduct included acquiring competitors, entering into exclusionary agreements with suppliers and distributors to prevent competitors from entering the market, engaging in sham patent infringement litigation, and redesigning the single-serve coffee pack products in the next version of its brewing system to lock out competitors' products. PW and co-counsel obtained final approval of a $31 million settlement in this matter.

Trepte v. Bionaire, Inc., Los Angeles County Superior Court, Case No. BC540110. PW attorneys served as Class Counsel in this certified class action alleging that the defendant sold defective space heaters. The complaint alleged that the defendant breached the warranty and falsely advertised the safety of the heaters due to design defects that cause the heaters to fail – and, as a result of the failure, the heaters could spark, smoke and catch fire. Final approval of the class settlement was granted.

In re Carrier IQ Consumer Privacy Litigation, Northern District of California, MDL No. 2330. PW attorneys served as interim co-lead counsel in this putative nationwide class action on behalf of consumers who alleged privacy violations arising from software installed on their mobile devices that was logging text messages and other sensitive information.

Sciortino v. PepsiCo, Inc., Northern District of California, Case No. 14-cv-0478. PW attorneys served as interim co-lead counsel in this putative California class action on behalf of consumers who alleged that PepsiCo failed to warn them that certain of its sodas contain excess levels of a chemical called 4-Methylimidazole in violation of Proposition 65 and California consumer protection statutes.

James v. UMG Recordings, Inc., Northern District of California, Case No. 11-cv-01613. PW partner Daniel L. Warshaw served as interim co-lead counsel in this putative nationwide class action on behalf of recording artists and music producers

who alleged that they had been systematically underpaid royalties by the record company UMG.

In re Warner Music Group Corp. Digital Downloads Litigation, Northern District of California, Case No. 12-cv-00559. PW attorneys served as interim co-lead counsel, with partner Bruce L. Simon serving as chairman of a five-firm executive committee, in this putative nationwide class action on behalf of recording artists and music producers who alleged that they had been systematically underpaid royalties by the record company Warner Music Group.

In re Dynamic Random Access Memory (DRAM) Antitrust Litigation, Northern District of California, MDL No. 1486. PW partner Bruce L. Simon served as co-chair of discovery and as a member of the trial preparation team in this multidistrict litigation arising from the price-fixing of DRAM, a form of computer memory. Mr. Simon was responsible for supervising and coordinating the review of almost a terabyte of electronic documents, setting and taking depositions, establishing and implementing protocols for cooperation between the direct and indirect plaintiffs as well as the Department of Justice, presenting oral arguments on discovery matters, working with defendants on evidentiary issues in preparation for trial, and preparing a comprehensive pretrial statement. Shortly before the scheduled trial, class counsel reached settlements with the last remaining defendants, bringing the total value of the class settlements to over $325 million.

In re Methionine Antitrust Litigation, Northern District of California, MDL No. 1311. PW partner Bruce L. Simon served as co-lead counsel in this nationwide antitrust class action involving a conspiracy to fix prices of, and allocate the markets for, methionine. Mr. Simon was personally responsible for many of the discovery aspects of the case including electronic document productions, coordination of document review teams, and depositions. Mr. Simon argued pretrial motions, prepared experts, and assisted in the preparation of most pleadings presented to the Court. This action resulted in over $100 million in settlement recovery for the Class.

In re Sodium Gluconate Antitrust Litigation, Northern District of California, MDL No. 1226. PW partner Bruce L. Simon served as class counsel in this consolidated antitrust class action arising from the price-fixing of sodium gluconate. Mr. Simon was selected by Judge Claudia Wilken to serve as lead counsel amongst many other candidates.

In re Citric Acid Antitrust Litigation, Northern District of California, MDL No. 1092. PW partner Bruce L. Simon served as class counsel in antitrust class actions against Archer-Daniels Midland Co. and others for their conspiracy to fix the prices of citric acid, a food additive product. Mr. Simon was one of the principal attorneys

involved in discovery in this matter. This proceeding resulted in over $80 million in settlements for the direct purchasers.

Olson v. Volkswagen of America, Inc., Central District of California, Case No. CV07-05334. PW attorneys brought this class action lawsuit against Volkswagen alleging that the service manual incorrectly stated the inspection and replacement intervals for timing belts on Audi and Volkswagen branded vehicles equipped with a 1.8 liter turbo-charged engine. This case resulted in a nationwide class settlement.

Swain v. Eel River Sawmills, Inc. et al., California Superior Court, DR-01-0216. Bruce L. Simon served as lead trial counsel for a class of former employees of a timber company whose retirement plan was lost through management's investment of plan assets in an Employee Stock Ownership Plan. Mr. Simon negotiated a substantial settlement on the eve of trial resulting in a recovery of approximately 40% to 50% of plaintiffs' damages after attorneys' fees and costs.

In re Homestore Litigation, Central District of California, Master File No. 01-11115. PW attorneys served as liaison counsel and class counsel for plaintiff CalSTRS in this securities class action. The case resulted in over $100 million in settlements to the Class.

In re MP3.Com, Inc., Securities Litigation, Southern District of California, Master File No. 00-CV-1873. PW attorneys served as defense counsel in this class action involving alleged securities violations under Rule 10b-5.

In re Automotive Refinishing Paint Cases, Alameda County Superior Court, Judicial Council Coordination Proceeding No. 4199. PW attorneys served as class counsel with other law firms in this coordinated antitrust class action alleging a conspiracy by defendants to fix the price of automotive refinishing products.

In re Beer Antitrust Litigation, Northern District of California, Case No. 97-20644-SW. PW partner Bruce L. Simon served as primary counsel in this antitrust class action brought on behalf of independent micro-breweries against Anheuser-Busch, Inc., for its attempt to monopolize the beer industry in the United States by denying access to distribution channels.

In re Commercial Tissue Products Public Entity Indirect Purchaser Antitrust Litigation, San Francisco Superior Court, Judicial Counsel Coordination Proceeding No. 4027. PW partner Bruce L. Simon served as co-lead counsel for the public entity purchaser class in this antitrust action arising from the price-fixing of commercial sanitary paper products.

PW
PEARSON WARSHAW

Hart v. Central Sprinkler Corporation, Los Angeles County Superior Court, Case No. BC176727. PW attorneys served as class counsel in this consumer class action arising from the sale of nine million defective fire sprinkler heads. This case resulted in a nationwide class settlement valued at approximately $37.5 million.

Rueda v. Schlumberger Resources Management Services, Inc., Los Angeles County Superior Court, Case No. BC235471. PW attorneys served as class counsel with other law firms representing customers of the Los Angeles Department of Water & Power ("LADWP") who had lead-leaching water meters installed on their properties. The Court granted final approval of the settlement whereby defendant would pay $1.5 million to a *cy pre*s fund to benefit the Class and to make grants to LADWP to assist in implementing a replacement program to the affected water meters.

In re Louisiana-Pacific Corp. Inner-Seal OSB Trade Practices Litigation, Northern District of California, MDL No. 1114. PW partner Bruce L. Simon worked on this nationwide product defect class action brought under the Lanham Act. The proposed class was certified, and a class settlement was finally approved by Chief Judge Vaughn Walker.

In re iPod nano Cases, Los Angeles County Superior Court, Judicial Counsel Coordination Proceeding No. 4469. PW attorneys were appointed co-lead counsel for this class action brought on behalf of California consumers who own defective iPod nanos. The case resulted in a favorable settlement.

Unity Entertainment Corp. v. MP3.Com, Central District of California, Case No. 00-11868. PW attorneys served as defense counsel in this class action alleging copyright infringement.

Vallier v. Jet Propulsion Laboratory, Central District of California, Case No. CV97-1171. PW attorneys served as lead counsel in this toxic tort action involving 50 cancer victims and their families.

Nguyen v. First USA N.A., Los Angeles County Superior Court, Case No. BC222846. PW attorneys served as class counsel on behalf of approximately four million First USA credit card holders whose information was sold to third party vendors without their consent. This case ultimately settled for an extremely valuable permanent injunction plus disgorgement of profits to worthy charities.

Morales v. Associates First Financial Capital Corporation, San Francisco Superior Court, Judicial Council Coordination Proceeding No. 4197. PW attorneys served as class counsel in this case arising from the wrongful sale of credit insurance in connection with personal and real estate-secured loans. This case resulted in an extraordinary $240 million recovery for the Class.

PW
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In re AEFA Overtime Cases, Los Angeles County Superior Court, Judicial Council Coordination Proceeding No. 4321. PW attorneys served as class counsel in this overtime class action on behalf of American Express Financial Advisors, which resulted in an outstanding class-wide settlement.

Khan v. Denny's Holdings, Inc., Los Angeles County Superior Court, Case No. BC177254. PW attorneys settled a class action lawsuit against Denny's for non-payment of overtime wages to its managers and general managers.

Kosnik v. Carrows Restaurants, Inc., Los Angeles County Superior Court, Case No. BC219809. PW attorneys settled a class action lawsuit against Carrows Restaurants for non-payment of overtime wages to its assistant managers and managers.

Castillo v. Pizza Hut, Inc., Los Angeles County Superior Court, Case No. BC318765. PW attorneys served as lead class counsel in this California class action brought by delivery drivers who claimed they were not adequately compensated for use of their personally owned vehicles. This case resulted in a statewide class settlement.

Baker v. Charles Schwab & Co., Inc., Los Angeles County Superior Court, Case No. BC286131. PW attorneys served as class counsel for investors who were charged a fee for transferring out assets between June 1, 2002 and May 31, 2003. This case resulted in a nationwide class settlement.

Eallonardo v. Metro-Goldwyn-Mayer, Inc., Los Angeles County Superior Court, Case No. BC286950. PW attorneys served as class counsel on behalf a nationwide class of consumers who purchased DVDs manufactured by defendants. Plaintiffs alleged that defendants engaged in false and misleading advertising relating to the sale of its DVDs. This case resulted in a nationwide class settlement.

Leiber v. Consumer Empowerment Bv A/K/A Fasttrack, Central District of California, Case No. CV 01-09923. PW attorneys served as defense counsel in this class action involving copyrighted music that was made available through a computer file sharing service without the publishers' permission.

Higgs v. SUSA California, Inc., Los Angeles County Superior Court Case No. BC372745. PW attorneys served as co-lead class counsel representing California consumers who entered into rental agreements for the use of self-storage facilities owned by defendants. In this certified class action, plaintiffs allege that defendants wrongfully denied access to the self-storage facility and/or charged excessive pre-foreclosure fees.

PW
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Fournier v. Lockheed Litigation, Los Angeles County Superior Court. PW attorneys served as counsel for 1,350 residents living at or near the Skunk-Works Facility in Burbank. The case resolved with a substantial confidential settlement for plaintiffs.

Nasseri v. CytoSport, Inc., Los Angeles County Superior Court, Case No. 439181. PW attorneys served as class counsel on behalf of a nationwide class of consumers who purchased CytoSport's popular protein powders, ready-to-drink protein beverages, and other "supplement" products. Plaintiffs alleged that these supplements contain excessive amounts of lead, cadmium and arsenic in amounts that exceed Proposition 65 and negate CytoSport's health claims regarding the products. The case resulted in a nationwide class action settlement which provided monetary relief to the class members and required the reformulation of CytoSport supplement products.

In re Samsung Top-Load Washing Machine Marketing, Sales Practice and Products Liability Litigation, Western District of Oklahoma, Case No. 5:17-ml-02792-D. Plaintiffs alleged that the top-load washing machines contain defects that cause them to leak and explode. PW Partner Melissa S. Weiner was appointed to the Plaintiffs' Steering Committee in this multidistrict class action, which settled nationwide.

PW
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CLIFFORD H. PEARSON

Founding Partner

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Clifford H. Pearson is a founding partner of Pearson Warshaw, LLP. Mr. Pearson is a civil litigator, business lawyer and mediator focusing on complex litigation, class actions, and business law. In 2013, 2016, and 2021 through 2025, Mr. Pearson was named by the *aily ournal* as one of the Top 100 Lawyers in California. Additionally, Mr. Pearson was named as one of the Daily Journal's 2019 Top Plaintiff Lawyers and in 2022, 2023, 2024 and 2025 he was named one of the Top Antitrust Lawyers. He was instrumental in negotiating a landmark settlement totaling $1.86 billion in *In re Credit efault Swaps Antitrust Litigation*, a case alleging a conspiracy among the world's largest banks to maintain opacity of the credit default swaps market. Mr. Pearson also negotiated $473 million in combined settlements in *In re -LC (lat Panel) Antitrust Litigation*, an antitrust case in the Northern District of California that alleged a decade-long conspiracy to fix the prices of TFT-LCD panels and over $90 million in *In re Potash Antitrust Litigation*, an antitrust case in the Northern District of Illinois that alleged price fixing by Russian, Belarusian and North American producers of potash, a main ingredient used in fertilizer.

Before creating the firm in 2006, Mr. Pearson was a partner at one of the largest firms in the San Fernando Valley, where he worked for 22 years. There, he represented aggrieved individuals, investors and employees in a wide variety of contexts, including toxic torts, consumer protection and wage and hour cases. During his career that spans over 40 years, Mr. Pearson has successfully negotiated substantial settlements on behalf of consumers, small businesses and companies. In recognition of his outstanding work on behalf of clients, Mr. Pearson has been regularly selected by his peers as a Super Lawyer (representing the top 5% of practicing lawyers in Southern California). He has also attained Martindale-Hubbell's highest rating (AV) for legal ability and ethical standards.

Mr. Pearson is an active member of the American Bar Association, Los Angeles County Bar Association, Consumer Attorneys of California, Consumer Attorneys Association of Los Angeles, and Association of Business Trial Lawyers.

Education:

Whittier Law School, Los Angeles, California – J.D. – 1981
University of Miami – M.B.A. – 1978
Carleton University, Ontario, Canada – B.A. – 1976

Bar Admissions:

State of California
United States Court of Appeals for the Ninth and Seventh Circuits
United States District Court for the Central District of California
United States District Court for the Eastern District of California
United States District Court for the Northern District of California
United States District Court for the Southern District of California

Professional Associations and Memberships:

American Bar Association
Association of Business Trial Lawyers
Los Angeles County Bar Association

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DANIEL L. WARSHAW

Founding Partner

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Email: dwarshaw@pwfirm.com



Daniel L. Warshaw, a founding partner of Pearson Warshaw, LLP, is a civil litigator and trial lawyer who focuses on antitrust, complex litigation, class actions, and consumer protection. Mr. Warshaw has held leadership roles in numerous state, federal and multidistrict class actions, and obtained significant recoveries for class members in many cases. These cases have included, among other things, antitrust violations, high-technology products, automotive parts, entertainment royalties, intellectual property and false and misleading advertising. Mr. Warshaw has also represented employees in a variety of class actions, including wage and hour, misclassification and other Labor Code violations.

Mr. Warshaw's cases have received significant attention in the press, and Mr. Warshaw has been profiled by the *aily ournal* for his work. Mr. Warshaw was named by the *aily ournal* as one of the Top 100 Lawyers in California each year from 2022 to 2025. In 2019 and 2020, Mr. Warshaw was named as one of the Daily Journal's Top Plaintiff Lawyers. In 2020 and from 2022 through 2025, he was also named one of the Daily Journal's Top Antitrust Lawyers. Mr. Warshaw has been selected by his peers as a Super Lawyer (representing the top 5% of practicing lawyers in Southern California) every year since 2005. Additionally, Mr. Warshaw is ranked by Chambers and Partners for antitrust litigation. He has also attained Martindale-Hubbell's highest rating (AV) for legal ability and ethical standards.

Mr. Warshaw played an integral role in several of the firm's groundbreaking cases. In *In re -LC (lat Panel) Antitrust Litigation*, 3:07-md-01827-SI (N.D. Cal.) he assisted in leading this multidistrict to trial and securing $473 million in recoveries to the direct purchaser plaintiff class. After the firm was appointed as interim co-lead counsel in *In re Credit efault Swaps Antitrust Litigation*, Mr. Warshaw, along with his partners and co-counsel, successfully secured a $1.86 billion settlement on behalf of the class.

Current Cases:

akil adeh v. he rustees of the California State University (Cal. Super. Ct.)
oo v. he Regents of the University of California (Cal. Super. Ct.)
In re Santa e atural obacco Co pany Marketing, Sales Practices, and Products Liability Litig. (D.N.M.)
In re P C Pipe Antitrust Litig. (N.D. Ill.)
Redner s Markets, Inc. v. La b eston Holdings, Inc. et al. (N.D. Ill.)
In re pisource LLC ata Breach Litigation (C.D. Cal.)
BCBS Antitrust Litig. (N.D. Ala.)
In re: Shell ggs Antitrust Litig. (W.D. Wis.)

Education:

Whittier Law School, Los Angeles, California – J.D. – 1996
University of Southern California – B.S. – 1992

Bar Admissions:

State of California
United States Court of Appeals for the Second, Seventh, Ninth and Tenth Circuits
United States District Court for the Central District of California
United States District Court for the Eastern District of California
United States District Court for the Northern District of California
United States District Court for the Southern District of California
United States District Court for the District of Colorado
United States District Court for the Northern District of Illinois
United States District Court for the Western District of Texas

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Mr. Warshaw served or currently serves in a lead or co-lead position in the following cases: *akil adeh v. he rustees of he California State University*, Los Angeles County Superior Court, Case No. 20STCV23134, a certified class action alleging that students were not properly refunded for tuition and fees when the California State University System closed its campuses and provided remote learning in lieu of in-person education; *i er an v. Para ount Global*, No. 23 Civ. 2409 (VSB) (S.D.N.Y.), a class action alleging that Paramount failed to adequately pay royalties for the dissemination of artists' works over satellite radio; and *Senne v. he ffice of the Co issioner of Baseball*, 3:14-cv-00608-JCS (N.D. Cal.), a certified multistate class action alleging that Major League Baseball and its teams violated state and federal wage and hour laws relating to minor league players.

Mr. Warshaw has assisted in the preparation of two Rutter Group practice guides: *ederal Civil rials vidence* and *Civil Clai s and efenses*. He is also the founder and Chair of the *Class Action Litigation oru* , whose purpose is to facilitate a high-level exchange of ideas and in-depth dialogue on class action litigation.

Professional Associations and Memberships:

American Bar Association
Association of Business Trial Lawyers, Board Member
Consumer Attorneys of California
Plaintiffs' Class Action Roundtable, Chair

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BRUCE L. SIMON

Founding Partner and Partner Emeritus

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Bruce L. Simon is a founding partner and partner emeritus at Pearson Warshaw, LLP and led the firm to national prominence. Mr. Simon specializes in complex cases involving antitrust, consumer fraud and securities. He has served as lead counsel in many business cases with national and global impact.

In 2019, Mr. Simon was named as one of the Daily Journal's Top Plaintiff Lawyers. In 2018, Mr. Simon was awarded "Antitrust Lawyer of the Year" by the California Lawyers Association. In 2013 and 2016, Mr. Simon was chosen by the Daily Journal as one of the Top 100 attorneys in California. In 2013, he received the California Lawyer of the Year award from California Lawyer Magazine and was selected as one of seven finalists for Consumer Attorney of the Year by Consumer Attorneys of California for his work in *In re -LC (lat Panel) Antitrust Litigation*, MDL No. 1827 (N.D. Cal.). That year, Mr. Simon was included in the Top 100 of California's "Super Lawyers" and has been named a "Super Lawyer" every year since 2003. He has attained Martindale-Hubbell's highest rating (AV) for legal ability and ethical standards.

Mr. Simon was co-lead class counsel in *In re -LC (lat Panel) Antitrust Litigation*, a case that lasted over five years and resulted in $473 million recovered for the direct purchaser plaintiffs. Mr. Simon served as co-lead trial counsel and was instrumental in obtaining an $87 million jury verdict (before trebling). He presented the opening argument and marshalled numerous witnesses during the six-week trial.

Also, Mr. Simon was co-lead class counsel in *In re Credit efault Swaps Antitrust Litigation*, a case alleging a conspiracy among the world's largest banks to maintain opacity of the credit default swaps market as a means of maintaining supracompetitive prices of bid/ask spreads. After three years of litigation and many months of intensive settlement negotiations, the parties in *C S* reached a landmark settlement amounting to $1.86 billion. It is one of the largest civil antitrust settlements in history.

Mr. Simon was also co-lead class counsel in *In re Potash Antitrust Litigation (II)*, MDL No. 1996 (N.D. Ill.), where he successfully argued an appeal of the district court's order denying the defendants' motions to dismiss to the United States Court of Appeals for the Seventh Circuit. Mr. Simon presented oral argument during an *en banc* hearing before the Court and achieved a unanimous 8-0 decision in his favor.

Reported Cases:

Minn-Che , Inc. et al. v. Agriu Inc., et al., 683 F.3d 845 (7th Cir. 2012)

In re ational Collegiate Athletic Association Athletic Grant-in-Aid Cap Antitrust Litig., 141 S.Ct. 2141 (2021).

Education:

University of California, Hastings College of the Law, San Francisco, California – J.D. – 1980

University of California, Berkeley, California – A.B. – 1977

Bar Admissions:

State of California

Supreme Court of the United States

United States Court of Appeals for the Ninth Circuit

United States Court of Appeals for the Seventh Circuit

United States District Court for the Central District of California

United States District Court for the Eastern District of California

United States District Court for the Northern District of California

United States District Court for the Southern District of California

Professional Associations and Memberships:

California State Bar Antitrust and Unfair Competition Section, Advisor and Past Chair

ABA Global Private Litigation Committee, Co-Chair

ABA International Cartel Workshop, Steering Committee

American Association for Justice, Business Torts Section, Past Chair

Business Torts Section of the American Trial Lawyers Association, Past Chair

PEARSON WARSHAW

The case resulted in $90 million in settlements for the direct purchaser plaintiffs, and the Court's opinion is one of the most significant regarding the scope of international antirust conspiracies.

More recently, Mr. Simon completed the trial seeking injunctive relief in the *In re ational Collegiate Athletic Association Athletic Grant-in-Aid Cap Antitrust Litigation*. The plaintiffs allege that the NCAA and its member conferences violate the antitrust laws by restricting the value of grant-in-aid athletic scholarships and other benefits that college football and basketball players can receive.

Hastings College of the Law, Board of Directors (2003-2015), Past Chair (2009-2011)

Publications:

Class Certification Procedure, Ch. V, ABA Antitrust Class Actions Handbook (3d ed.), (forthcoming)

Reverse Engineering Your Antitrust Case: Plan for Trial Even Before You File Your Case, Antitrust, Vol. 28, No. 2, Spring 2014

he wnership/Control ception to Illinois Brick in Hi- ech Co ponent Cases: A Rule hat Recogni es the Realities of Corporate Price i ing, ABA International Cartel Workshop February 2014

Matthew Bender Practice Guide: California Unfair Co petition and Business orts, LexisNexis, with Justice Conrad L. Rushing and Judge Elia Weinbach (Updated 2013)

he uestionable Use of Rule Motions to Li it iscovery and li inate Allegations in Civil Antitrust Co plaints in the United States, ABA International Cartel Workshop February 2012

PEARSON WARSHAW

MELISSA S. WEINER

Partner



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Melissa S. Weiner is a partner and civil litigator whose work is squarely focused on combating consumer deception. Her experience is expansive, including class actions related to consumer protection, product defect, intellectual property, automotive, false advertising and data breach. Ms. Weiner has taken a leadership role in numerous large class actions and MDLs in cases across the country and lectures regularly on complex litigation matters.

Since her admission to the bar in 2007, she has earned appointment in a variety of MDLs and class actions throughout the country. She serves as the Co-Chair of the Plaintiffs' Steering Committee in *In Re: Change Healthcare, Inc. Custo er ata Security Litigation* and as a member of the Plaintiffs' Executive Committee in *In re: M it Custo er ata Security Breach Litigation*, MDL No. 1:23-md-03083-ADB (D. Mass.), two of the largest data breach MDLs in the country. Additionally, she chairs the Plaintiffs' Executive Committee in *In Re Santa e atural obacco Co pany Marketing Sales Practices and Products Liability Litigation*, No. 1:16-md-02695-JB-LF (D.N.M.), where she co-led the strategy on class certification, which resulted in achieving class certification for a class of cigarette purchasers.

A significant contributor to her professional community, Ms. Weiner is the Treasurer and Chair of the Development Committee for Public Justice. Ms. Weiner is an active member of the Minnesota bar, and a former Co-Chair of the Mass Tort and Class Action Practice Group for the Minnesota Chapter of the Federal Bar Association where, in collaboration with the bench, she helped institute new recommended procedures for inclusion of newer and diverse attorneys in key litigation roles to combat the steep decline of in-court opportunities that disproportionately affect women, diverse attorneys, and other underrepresented groups. Dedicated to her identity as a Jewish lawyer, Ms. Weiner is also the Co-Chair of the Twin Cities Cardozo Society, an affinity group of the Minneapolis and St. Paul Jewish Federations, which is the leading Jewish lawyers' network serving the community.

In recognition of her outstanding efforts in the legal community, each year since 2012, Ms. Weiner has been named a Super Lawyers *Rising Star* by Minnesota Law & Politics.

Current Cases:

- *Ashour v. Ari ona Beverages USA LLC et al.* (S.D.N.Y.) *(false advertising/ islabeling)*
- *Benson et al. v. ewell Brands Inc., et al.* (N.D. Ill.) *(false advertising/ islabeling)*
- *In Re Santa e atural obacco Co. Mktg., Sales Pracs., and Prods. Liability Litig.* (D.N.M.) *(false advertising/ islabeling)*
- *In re: Apple Inc. App Store Si ulated Casino-Style Ga es Litig. In re: acebook, Inc. App Center Si ulated Casino-Style Ga es Litig. and In re: Google Play Store Si ulated Casino-Style Ga es Litig.* (N.D. Cal.)
- *utraceutical ellness, Inc. Consu er raud Litig.* (S.D.N.Y.) *(false advertising/ islabeling)*
- *In Re: Change Healthcare, Inc. Custo er ata Secs. Breach Litig.* (D. Minn.) (*data breach*)
- *In re: M it Custo er ata Sec. Breach Litig.* (D. Mass.) (*data breach*)
- *Bounthon, et al. v. he Proctor Ga ble Co.* (N.D. Cal.) (*false advertising/ islabeling*)
- *Burkhardt, et al. v. Moneylion echs, Inc., et al.* (N.D. Fla.) (*consu er protection*)

PW
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Ms. Weiner has been appointed to leadership positions in the following MDLs and consolidated cases:

In Re: Change Healthcare, Inc. Custo er ata Security Breach Litig., (D. Minn.) (Appointed as the Co-Chair of the Plaintiff Steering Committee in the Patient Track);
In re M it Custo er ata Security Breach Litig. (D. Mass.) (Appointed to Plaintiffs' Steering Committee);
In Re: airlife Milk Products Marketing and Sales Practices Litig. (N.D. Ill.) (Appointed Interim Co-Lead Counsel);
In Re Santa e atural obacco Co pany Marketing Sales Practices and Products Liability Litig. (D.N.M.) (chair of the Plaintiffs' Steering Committee and member of the Plaintiffs' Oversight Committee);
In Re: Blackbaud, Inc. Custo er ata Security Breach Litig. (D.S.C.), nationwide data breach class action, (appointed to Plaintiffs' Steering Committee);
usko v. elta Airlines, Inc. (N.D. Ga.), a nationwide breach of contract class action (appointed as Co-Lead Class Counsel);
In re Apple Inc. App Store Si ulated Casino Style Ga es Litig. (N.D. Cal.), a multi-state statutory class action (appointed to Plaintiffs' Steering Committee);
In Re Sa sung op-Load ashing Machine Marketing, Sales Practices Product Liability Litig. (W.D. Okla.), (appointed to Plaintiffs' Executive Committee), a nationwide class action regarding a design defect in 2.8 million top loading washing machines, which resulted in a nationwide settlement;
In Re indsor ood Clad indow Product Liability Litig. (E.D. Wis.), a nationwide class action regarding allegedly defective windows, which resulted in a nationwide settlement (Appointed Interim Executive Committee Member);
In Re: Lu ottica of A erica, Inc. ata Security Breach Litig. (S.D. Ohio) (Appointed Interim Executive Committee Member);
Culbertson v. eloitte Consulting LLP (S.D.N.Y.) (Appointed to Plaintiffs' Executive Committee), a nationwide data breach class action;
In re: M GI igestive Health, PA (D. Minn.) (Appointed to Plaintiffs' Executive Committee), a nationwide data breach class action.

Education:

William Mitchell College of Law – J.D. – 2007
University of Michigan – Ann Arbor – B.A. – 2004

Bar Admissions:

State of New York
State of Minnesota
United States Court of Appeals for the Ninth Circuit
United States District Court for the District of Minnesota
United States District Court for the District of Colorado
United States District Court for the Northern District of Illinois
United States District Court for the Southern District of New York
United States District Court for the Eastern District of New York

Professional Associations and Memberships:

Minnesota State Bar Association
Federal Bar Association
Public Justice

PW
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BOBBY POUYA

Partner

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Email: bpouya@pwfirm.com



Bobby Pouya is a partner in the firm's Los Angeles office, focusing on complex litigation, antitrust litigation, and class actions. Effective advocacy in complex litigation requires experience and understanding of the multiple phases of these cases from inception through trial. During his career, Mr. Pouya has established himself as a member of the small category of attorneys who has personal experience leading litigation teams in each of these phases including, complex dispositive motions, high-level depositions, class certification, settlement negotiation and approval, expert witness presentation, and trial and appellate advocacy.

Mr. Pouya has served in a leadership position in numerous complex multiparty cases that have resulted in hundreds of millions of dollars in recovery on behalf of his clients, including: *Senne, et al. v. ffice of the Co issioner of Baseball, et al.* (N.D. Cal.) (co-lead class counsel in a wage and hour class action on behalf of minor league baseball players resulting in a $185 million settlement); *In re Broiler Chicken Antitrust Litigation* (N.D. Ill.) (co-lead class counsel for direct purchaser plaintiffs in an antitrust conspiracy involving the sale of chicken resulting in $284 million in settlements); *In re Pork Antitrust Litigation* (D. Minn.) (co-lead class counsel for direct purchaser plaintiffs in an antitrust conspiracy involving the sale of pork resulting in over $180 million in settlements); *In re Polyurethane oa Antitrust Litigation* (N.D. Ohio.) (member of executive committee for direct purchaser plaintiffs in an antitrust class action involving polyurethane foam products that resulted in over $400 million in settlements).

Mr. Pouya currently serves as a member of the leadership team for plaintiffs in multiple notable antitrust actions including: *In re Cattle and Beef Antitrust Litigation* (D. Minn.) (executive committee for cattle rancher class), *In re Shale Antitrust Litigation* (executive committee for indirect class plaintiffs); *Conry v. Gerber* (discovery committee for indirect class plaintiffs); *In re P C Pipe Antitrust Litigation* (lead counsel for end-user purchaser class plaintiffs); BCBS Antitrust Litigation (N.D. Ala.) (counsel for multiple provider opt-out plaintiffs); and *In re Shell ggs Antitrust Litigation* (W.D. Wis.). Mr. Pouya also has a proven track record of representing consumers, members of the entertainment industry, and employees in a number of class actions.

Mr. Pouya's success has earned him recognition by his peers as a Southern California Super Lawyer and Super Lawyer Rising Star. Mr. Pouya earned his Juris Doctor from Pepperdine University School of Law in 2006, where he received a certificate in dispute resolution from the prestigious Straus Institute for Dispute Resolution and participated on the interschool trial and mediation advocacy teams.

Current and Notable Cases:

In re Broiler Chicken Antitrust Litig. (N.D. Ill.)
In re Pork Antitrust Litig. (D. Minn.)
In re Cattle Antitrust Litig. (D. Minn.)
In re Shale il Antitrust Litig. (D.N.M.)
In re P C Pipe Antitrust Litig. (N.D. Ill.)
Conry, et al. v. Gerber Products Co pany, et al. (E.D.N.Y.)
Redner s Markets, Inc. v. La b eston Holdings, Inc. et al. (N.D. Ill.)
BCBS Antitrust Litig. (N.D. Ala.)
In re: Shell ggs Antitrust Litig. (W.D. Wis.)

Education:

Pepperdine University School of Law, Malibu, California – J.D. – 2006
University of California, Santa Barbara, California – B.A., with honors – 2003

Publications:

Should ffers Moot Clai s Daily Journal, Oct. 10, 2014
Central istrict Local Rules Hinder Class Certification, Daily Journal, April 9, 2013

Bar Admissions:

State of California
United States Court of Appeals for the Ninth and Seventh Circuits
United States District Court for the Central, Northern, Southern and Eastern Districts of California

Professional Associations and Memberships:

American Bar Association
Consumer Attorneys of California
Los Angeles County Bar Association

PW
PEARSON WARSHAW



MICHAEL H. PEARSON

Partner

Location: Sherman Oaks, California

Phone: (818) 205-2803

Email: mpearson@pwfirm.com

Michael H. Pearson is a partner and civil litigator in the firm's Los Angeles office, focusing on complex litigation, class actions, and consumer protection. Mr. Pearson has extensive experience in representing clients in a variety of contexts. He has served as a member of the litigation team in multiple cases that resulted in class certification or a class-wide settlement, including cases that involved antitrust, business litigation, complex financial products, high-technology products, consumer safety, and false and misleading advertising. *In re Broiler Chicken Antitrust Litigation*, No. 16 C 8637, 2022 WL 1720468 (N.D. Ill. May 27, 2022); *In re Pork Antitrust Litigation*, No. CV 18-1776 (JRT/JFD), 2023 WL 2696497 (D. Minn. Mar. 29, 2023); *Benson v. ewell Brands, Inc.*, No. 19 C 6836, 2021 WL 5321510 (N.D. Ill. Nov. 16, 2021). Specifically, he was instrumental in managing the review of tens of millions of documents and drafting pleadings in *In Re Credit efault Swaps Antitrust Litigation*, which was settled for $1.86 billion, plus injunctive relief.

Mr. Pearson received his Bachelor of Science degree from Tulane University in 2008, majoring in Finance with an Energy Specialization. He received his Juris Doctor from Loyola Law School Los Angeles in 2011. Mr. Pearson is an active member in a number of legal organizations, including the American Bar Association, Los Angeles County Bar Association, and the Association of Business Trial Lawyers.

Mr. Pearson's success has earned him recognition by his peers as a Super Lawyers Rising Star (representing the top 2.5% of lawyers in Southern California age 40 or younger or in practice for 10 years or less) each year from 2017 to the present.

Bar Admissions:

State of California
United States Court of Appeals for the Ninth Circuit
United States District Court for the Central District of California
United States District Court for the Eastern District of California
United States District Court for the Northern District of California
United States District Court for the Southern District of California
United States District Court for the Northern District of Illinois

Professional Association and Memberships:

American Bar Association
Association of Business Trial Lawyers
Los Angeles County Bar Association

Current Cases:

In re Cattle Antitrust Litig. (D. Minn.)
Benson et al. v. ewell Brands Inc., et al. (N.D. Ill.)
Beaver v. issan orth A erica, Inc. (M.D. Tenn.)
Stockley, et al. v. issan of orth A erica, Inc., et al. (M.D. Tenn.)
In Re: Change Healthcare, Inc. Custo er ata Security Breach Litig. (D. Minn.)
In re P C Pipe Antitrust Litig. (N.D. Ill.)
Redner s Markets, Inc. v. La b eston Holdings, Inc. et al. (N.D. Ill.)
BCBS Antitrust Litig. (N.D. Ala.)
In re: Shell ggs Antitrust Litig. (W.D. Wis.)

Past Cases:

In re ational Collegiate Athletic Association Athletic Grant-in-Aid Cap Antitrust Litig. (N.D. Cal.) – **$208 million settlement**
In re Credit efault Swaps Antitrust Litig. (S.D.N.Y.) – **$1.86 billion settlement**
In Re airlife Milk Products Marketing And Sales Practices Litig. (N.D. Ill.) – **$21 million settlement**
repte v. Bionaire, Inc. (Cal. Sup. Ct.)
ree an v. MAM USA Corp. (N.D. Ill.)
Busler v. issan . A ., Inc. (M.D. Tenn.)
Martine v. issan . A ., Inc. (M.D. Tenn)
Senne, et al. v. ffice of the Co issioner of Baseball, et al. (N.D. Cal.) – **$185 million settlement**
In re Broiler Chicken Antitrust Litig. (N.D. Ill.) **$284 million in settlements**
In re Pork Antitrust Litig. (D. Minn.) **$180 million in settlements**

Education:

Loyola Law School Los Angeles, Los Angeles, California – J.D. – 2011
Tulane University, New Orleans, Louisiana – B.S., *agna cu laude* - 2008

PW
PEARSON WARSHAW

MATTHEW A. PEARSON

Partner



Location: Sherman Oaks, California

Phone: (818) 205-2806

Email: mapearson@pwfirm.com

Matthew Pearson is a partner in the firm's Los Angeles office, where he concentrates his litigation practice on a diverse range of complex matters including antitrust, consumer protection, business litigation, intellectual property and childhood sexual abuse matters. Mr. Pearson's comprehensive understanding of the legal landscape, coupled with a tenacious approach to advocacy, has consistently yielded favorable outcomes for his clients. Mr. Pearson received his Bachelor of Science degree from the University of Arizona in 2010, majoring in Business Management, and received his Juris Doctor from Whittier Law School in 2013.

Throughout his career, Mr. Pearson has cultivated significant expertise in navigating multifaceted litigation scenarios. Mr. Pearson's experience spans a wide spectrum of legal domains, including complex toxic tort litigation, intricate business disputes, intellectual property matters, products liability claims, sensitive family law cases, and high-stakes personal injury actions. This broad exposure has equipped him with a versatile skill set. Mr. Pearson has diligently represented a diverse clientele, ranging from publicly traded and privately held companies and closely held corporations to thousands of individuals seeking justice and effective legal representation.

A significant portion of Mr. Pearson's career has been dedicated to complex antitrust litigation. Mr. Pearson played an integral role as a member of the litigation team in the *ational Collegiate Athletic Association Athletic Grant-in-Aid Cap Antitrust Litigation* (N.D. Cal.). This pivotal case culminated in a significant victory in 2018 following a several-week-long bench trial. There, plaintiffs' win resulted in crucial injunctive relief for student-athletes. The damages portion of this impactful litigation had been previously resolved through a substantial $208 million settlement, underscoring the team's dedication and effectiveness. In recognition of their exceptional achievement in this matter, the plaintiffs' litigation team, including Mr. Pearson, was honored with the prestigious "Outstanding Antitrust Litigation Achievement in Private Law Practice" award by the American Antitrust Institute (AAI) in 2019. The hard-fought victory was further validated when the United States Supreme Court unanimously upheld the district court's verdict in a resounding 9-0 decision, solidifying its significance in antitrust law.

Current Cases:

In re Cattle Antitrust Litig. (D. Minn.)
In re P C Pipe Antitrust Litig. (N.D. Ill.)
Casino-Style Ga es Litig. (N.D. Cal.)
In re orthern California Clergy Cases (Cal. Sup. Ct.)
In re Southern California Clergy Cases (Cal. Sup. Ct.)
In re he San iego iocese Cases (Cal. Sup. Ct.)
Redner s Markets, Inc. v. La b eston Holdings, Inc. et al. (N.D. Ill.)
In re pisource LLC ata Breach Litig. (C.D. Cal.)
BCBS Antitrust Litig. (N.D. Ala.)
In re: Shell ggs Antitrust Litig. (W.D. Wis.)

Past Cases:

In re: Keurig Green Mountain Single-Serve Coffee Antitrust Litig. (S.D.N.Y.) **$31 million settlement**
Grace v. Apple, Inc. (N.D. Cal.) **$18 million settlement**
In re ational Collegiate Athletic Association Athletic Grant-in-Aid Cap Antitrust Litig. (N.D. Cal.) **$208 million settlement**
In re Credit efault Swaps Antitrust Litig. (S.D.N.Y.) **$1.86 billion settlement**
ashoo v. Iovate Health Sciences USA Inc. (C.D. Cal.) **$2.5 million settlement**
In re Broiler Chicken Antitrust Litig. (N.D. Ill.) **$284 million in settlements**
In re Pork Antitrust Litig. (D. Minn.) **$180 million in settlements**

Education:

Whittier Law School, California – J.D. – 2013
University of Arizona: Eller College of Management – B.S. – 2010

PEARSON WARSHAW

More recently, Mr. Pearson was a vital member of the trial team in a complex antitrust case alleging a conspiracy between professional sports leagues.

Beyond his active casework, Mr. Pearson is deeply engaged in the legal community through his membership in several prominent legal organizations, including the American Bar Association, the Association of Business Trial Lawyers, and the Los Angeles County Bar Association. Mr. Pearson's commitment to professional excellence and his standing within the legal community are further underscored by his consistent selection as a Southern California Rising Star by Super Lawyers from 2019 to the present.

Bar Admissions:

State of California
United States Court of Appeals for the Second and Ninth Circuits
United States District Court for the Central District of California
United States District Court for the Eastern District of California
United States District Court for the Northern District of California
United States District Court for the Southern District of California

Professional Associations and Memberships:

American Bar Association
Association of Business Trial Lawyers
Los Angeles County Bar Association

PW
PEARSON WARSHAW



RACHEL SOFFIN

Partner

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Rachel Soffin is a partner whose work is focused on consumer class action litigation. Ms. Soffin's class action experience during her twenty-year career is vast and includes litigation in the areas of defective consumer products, automotive, false advertising and mislabeling, breach of contract, and deceptive and unfair trade practices. Ms. Soffin has been appointed to leadership roles in numerous class action cases across the country and regularly speaks at national continuing legal education conferences on complex class action litigation topics.

Ms. Soffin has litigated and resolved many significant complex class actions, including *Seresto lea and ick Collar Manufacturing Sales Practices and Products Liability Litigation* (N.D. Ill.), where she was appointed co-lead counsel in a class action involving allegedly dangerous and defective pet pesticide collars. In this high-profile nationwide consumer protection action, Ms. Soffin and co-counsel achieved a $15 million settlement following significant investigation and litigation, including work with various experts in veterinary medicine, epidemiology, materials sciences and engineering.

Ms. Soffin has dedicated the majority of her career to protecting consumers. After spending the first five years of her career representing corporations, Ms. Soffin chose to focus her work on protecting individuals from corporate malfeasance. In recognition of her contributions to complex litigation, Ms. Soffin has been designated by Super Lawyers as a Florida Rising Star from 2011 to 2013 and as a Florida Super Lawyer from 2014 to 2018, 2022 to 2025 in the fields of Class Actions and Mass Torts.

Since her admission to the bar in 2005, Ms. Soffin has represented consumers and also served as class counsel in numerous successful class actions, including:

Seresto lea and ick Collar Mktg., Sales Practices and Prod. Liab. Litig. (N.D. Ill.) (court-appointed co-lead counsel in class action involving allegedly dangerous and defective pet pesticide collars, resulting in $15 million settlement);
In re: All-Clad Metalcrafters LLC, Cookware Mktg. and Sales Pracs. Litig., (W.D. Pa.) (co-lead counsel in class action involving defective cookware, resulting in settlement of up to $4 million);

Current Cases:

In Re: Bestway Above-Ground Pools Litig. (N.D. Ill.)

Education:

Stetson University College of Law – J.D. – 2005
Florida State University – B.A. – 2002

Bar Admissions:

State of Florida
State of Georgia
United States Court of Appeals for the Eleventh Circuit
United States District Court for the Middle District of Florida
United States District Court for the Southern District of Florida
United States District Court for the Northern District of Georgia
United States District Court for the Northern District of Illinois

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In Re: racfone Unli ited Service Plan Litig. (N.D. Cal.) ($40 million settlement for consumers subjected to deceptive cellular phone data plan practices);
Ber an, et al. v. Gen. Motors LLC (S.D. Fla.) ($40 million value settlement in class action involving defective automobiles);
e Leon v. Bank of A ., .A. (USA) (M.D. Fla.) ($10 million settlement for consumers subjected to breach of cardholder agreement and deceptive trade practices);
ickens, *et al. v. hin Inc.* (S.D.N.Y.) (settlement of up to $5 million in class action involving false advertising of products containing Per-and polyfluoroalkyl substances ("PFAS"));
Spencer, *et al. v. Kni* (S.D.N.Y.) (settlement of up to $2 million in class action involving false advertising of products containing PFAS;
Peterson, *et al. v. BSH Ho e Appliances Corp.* (W.D. Wash.) (settlement of up to $2 million in class action involving defective ovens);
Ha v. Sharp lectronics Corporation (S.D. Fla.) (over $100 million value settlement in class action involving defective microwaves);
In Re: Hori on rganic Milk Plus HA ega- Mktg. and Sales Prac. Litig. (S.D. Fla.) ($1.3 million settlement value for consumers subjected to deceptive trade practices involving product misrepresentations);
Swift v. Bank of A . (M.D. Fla.) ($1 million settlement for consumers subjected to TCPA violations).

PW
PEARSON WARSHAW

NEIL J. SWARTZBERG

Of Counsel



Location: San Francisco, California

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Email: nswartzberg@pwfirm.com

Neil Swartzberg, of counsel to Pearson Warshaw, LLP, has significant litigation and counseling experience, with a track record of providing advice and representation to individuals and companies. He has expertise in complex and commercial litigation, focusing on consumer protection, antitrust and securities laws, primarily in the class action context. Practicing in both federal and state courts, he has litigated price-fixing class actions, securities fraud suits and other consumer protection cases, as well as patent infringement, trade secret misappropriation and related intellectual property matters.

Mr. Swartzberg was a leading attorney in *In re Static Rando Access Me ory (SRAM) Antitrust Litigation* (N.D. Cal.). He was also actively involved in several other antitrust class actions, such as *In re Broiler Chicken Antitrust Litigation* (N.D. Ill.), *In re International Air ransportation Surcharge Antitrust Litigation* (N.D. Cal.), *Air Cargo Shipping Services Antitrust Litigation* (E.D.N.Y.), *In re Cathode Ray ube (CR) Antitrust Litigation* (N.D. Cal.), and *In re ptical isk rive ( ) Antitrust Litigation* (N.D. Cal.). In addition, he has represented patent owners and companies in infringement cases for patents covering video game controllers, Internet search functionality, secure mobile banking transactions and telecommunications switches.

His current cases include: a direct purchaser antitrust class actions against the leading domestic producers of pork; an indirect purchaser antitrust class action against PVC (plastic) pipe manufacturers, several class actions on behalf students against colleges and universities seeking partial refunds of tuition and fees because of the schools closing their campuses and transitioning to online-only classes in the wake of COVID-19; an antitrust suit challenging the conduct of Major League Soccer and the United States Soccer Federation to exclude competition in men's professional soccer; and direct purchaser (opt-out) cases by health care providers against the Blue Cross and Blue Shield Association and its member insurance companies alleging antitrust violations, including market allocation agreements.

Professional Associations and Memberships:

American Bar Association

Languages:

German (proficient)

Current Cases:

In re Pork Antitrust Litig. (D. Minn.)
akil adeh v. he rustees of California State University (Cal. Sup. Ct., Los Angeles)
Stoffel v. he Regents of the University of California (Cal. Sup. Ct., Los Angeles)
In re P C Pipe Antitrust Litig. (N.D. Ill.)
BCBS Antitrust Litig. (N.D. Ala.)
In re: Shell ggs Antitrust Litig. (W.D. Wis.)

Education:

University of California, Davis, School of Law – J.D. – 2001
State University of New York, Buffalo – M.A. – 1994
Duke University – A.B. – 1991

Bar Admissions:

State of California
United States Court of Appeals for the Ninth Circuit
Federal Circuit Court of Appeals
United States District Court for the Central District of California
United States District Court for the Eastern District of California
United States District Court for the Northern District of California
United States District Court for the Eastern District of Missouri
United States District Court for the Western District of Pennsylvania

Publications and Presentations:

he Hard Cell, Mobile banking and the ederal Circuit s divided infringe ent decisions, Feb. 2013, Intellectual Property magazine, with Robert D. Becker

PW
PEARSON WARSHAW

NAVEED ABAIE

Associate



Location: Los Angeles, California

Phone: (818) 205-2802

Email: nabaie@pwfirm.com

Naveed Abaie is an associate in the firm's Los Angeles office focusing on consumer protection, antitrust, and business litigation. Mr. Abaie recently served on the co-lead class counsel trial team on behalf of a certified class of direct purchaser plaintiffs in *In re Broiler Chicken Antitrust Litigation*, Northern District of Illinois, Case No. 1:16-cv-08637. Trial commenced in September 2023, and the complaint alleged that the nation's largest broiler chicken producers violated antitrust laws by limiting production and manipulating the price indices. PW and co-counsel secured settlements of over $284 million for the direct purchaser plaintiffs.

Mr. Abaie graduated from the University of San Diego, School of Law in 2017. While at the University of San Diego, he earned his J.D. with a concentration in Business and Corporate Law. Mr. Abaie received his Bachelor's degree from the University of California, Berkeley Haas School of Business in 2012.

Current Cases:

In re Pork Antitrust Litig. (D. Minn.)
In re Cattle Antitrust Litig. (D. Minn.)
oyle v. esla, Inc. (N.D. Cal.)
In re orthern California Clergy Cases (Cal. Sup. Ct.)
In re Southern California Clergy Cases (Cal. Sup. Ct.)
In re he San iego iocese Cases (Cal. Sup. Ct.)
In re P C Pipe Antitrust Litig. (N.D. Ill.)
Redner s Markets, Inc. v. La b eston Holdings, Inc. et al. (N.D. Ill.)
BCBS Antitrust Litig. (N.D. Ala.)
In re: Shell ggs Antitrust Litig. (W.D. Wis.)

Education:

University of San Diego, California – J.D. – 2017
University of California, Berkeley, California – B.A. – 2012

Bar Admissions:

State of California
United States District Court for the Central District of California
United States District Court for the Eastern District of California
United States District Court for the Northern District of California

Professional Associations and Memberships:

Association of Business Trial Lawyers

PW
PEARSON WARSHAW

BRIAN S. PAFUNDI
Associate



Location: Minneapolis, Minnesota

Phone: (612) 389-0604

Email: bpafundi@pwfirm.com

Brian S. Pafundi is an associate in the firm's Minneapolis office focusing on antitrust and consumer protection class actions.

Mr. Pafundi received his B.A. in Political Science in 2005 and a Master of Arts degree in Mass Communications in 2009, both from the University of Florida. His graduate research focused on communications law and policy generally, and specifically, public records and open meetings laws. His research on public access to criminal discovery records has been quoted by the Tennessee Supreme Court, *see ennessean v. Metro. Gov t of ashville*, 485 S.W.3d 857, 871 (Tenn. 2016), and is cited in LaFave and Israel's Criminal Procedure Practice Series treatise. *See* n. 198, § 23.1(d) Closed proceedings: First Amendment right of access, 6 Crim. Proc. § 23.1(d) (4th ed.).

Mr. Pafundi graduated from the University of Florida Levin College of Law in 2010. After law school he worked as an Assistant Public Defender for the State of Minnesota where he handled a full and diverse caseload, including representing juveniles in delinquency proceedings and representing hundreds of adult criminal defendants across Minnesota's Third Judicial district.

During his tenure with the Public Defender's office, Mr. Pafundi served as lead attorney for numerous serious felony trials and represented a handful of individuals indicted on first-degree murder charges from initial appearance all the way through resolution of the matter.

Since joining Pearson Warshaw, Mr. Pafundi has worked on many of the firm's complex antitrust litigation matters, including all three protein cases, while also assisting on a handful of the false and deceptive advertising matters, leveraging his research background and courtroom experience to enhance the firm's work across all cases.

Current Cases:

In re Pork Antitrust Litigation (D. Minn.)
ree an v. MAM USA Corp. (N.D. Ill.)
In re Cattle Antitrust Litigation (D. Minn.)
In re P C Pipe Antitrust Litig. (D. Ill.)
Ashour v. Ari ona Beverages USA LLC et al. (S.D.N.Y.) (false advertising/mislabeling)
Redner s Markets, Inc. v. La b eston Holdings, Inc. et al. (N.D. Ill.)

Education:

University of Florida Levin College of Law – J.D. – 2010
University of Florida College of Journalism and Communications – M.A. – 2009
University of Florida College of Liberal Arts and Science – B.A. – 2005

Bar Admissions:

State of Minnesota
Supreme Court of the United States
United States District Court for the District of Minnesota

Professional Associations and Memberships:

Minnesota State Bar Association

Publications:

Public Access to Cri inal iscovery

PEARSON WARSHAW

ADRIAN J. BUONANOCE

Associate



Location: Sherman Oaks, California

Phone: (818) 205-2807

Email: abuonanoce@pwfirm.com

Adrian J. Buonanoce is an associate in the firm's Los Angeles office, focusing on antitrust and consumer protection litigation.

Mr. Buonanoce received a Bachelor's degree in Political Economy from the University of California, Berkeley in 2012. He earned a Juris Doctor from the University of San Diego School of Law with a concentration in International Law in 2018. In 2024, Mr. Buonanoce published "The Basics of Antitrust" in the Consumer Attorneys of California Forum magazine.

In January 2025, Mr. Buonanoce was a core member of the trial team in the matter of *orth A erican Soccer League, LLC v. United States Soccer ederation, Inc., et al.* The case was tried in the Eastern District of New York and lasted three weeks. The intense demands and intricate nature of this trial have had a great impact on Mr. Buonanoce's development as a trial lawyer in high-stakes complex litigation.

Current Cases:

akil adeh v. he rustees of California State University (Cal. Sup. Ct., Los Angeles)
In re Pork Antitrust Litig. (D. Minn.)
In re Cattle Antitrust Litig. (D. Minn.)
i er an v. Para ount Global (S.D.N.Y.)
In re P C Pipe Antitrust Litig. (D. Ill)
In re Granulated Sugar Antitrust Litig. (D. Minn.)
Conry, et al. v. Gerber Products Co pany, et al. (E.D.N.Y.)
Redner s Markets, Inc. v. La b eston Holdings, Inc. et al. (N.D. Ill.)
BCBS Antitrust Litig. (N.D. Ala.)
In re: Shell ggs Antitrust Litig. (W.D. Wis.)

Education:

University of San Diego, California – J.D. – 2018
University of California, Berkeley, California – B.A. – 2012

Bar Admissions:

State of California
United States District Court for the Central District of California
United States District Court for the Northern District of California

Professional Associations and Memberships:

Association of Business Trial Lawyers
Public Justice

Publications:

he Basics of Antitrust, Consumer Attorneys of California Forum Magazine, vol. 54, no. 1, 2024, pp. 32-35

PW
PEARSON WARSHAW



RYAN T. GOTT
Associate

Location: Minneapolis, Minnesota

Phone: (612) 389-0602

Email: rgott@pwfirm.com

Ryan T. Gott is an attorney in the firm's Minnesota office with a practice focused on consumer protection, data privacy & security, false advertising, product liability and environmental law matters.

Mr. Gott has a demonstrated history of litigation success in both state and federal courts, including multiple appearances and favorable results before the Minnesota Supreme Court and federal district courts. He is a passionate advocate for his clients with a dedication to open communication and consultation.

In the litigation and maintenance of two of the largest data breach MDLs in the country, *In Re: Change Healthcare, Inc. Custo er ata Security Litigation* and *In re: M it Custo er ata Security Breach Litigation*, Mr. Gott is tasked with dispositive motion briefing, plaintiff vetting and ESI preservation coordination, offensive, non-party and expert discovery and depositions.

Mr. Gott is an active member of Electronic Document Retention and Production Working Group of The Sedona Conference, which seeks to develop principles, guidance and best practice recommendations for information governance and electronic discovery. Mr. Gott serves on multiple Public Justice committees including the Access to Justice Task Force and the Class Action Preservation Project Task Force. Mr. Gott also serves as a board member on multiple nonprofits within the Twin Cities and is dedicated to the University of St. Thomas School of Law, its students and graduates.

Bar Admissions:

State of Minnesota
United States District Court for the District of Minnesota
United States District Court for the District of Colorado
United States District Court for the North District of Illinois

Education:

University of St. Thomas School of Law - J.D. - 2015
Saint John's University - B.A. - 2012

Current Cases:

Ashour v. Ari ona Beverages USA LLC et al. (S.D.N.Y.) (false advertising/mislabeling)
Benson et al. v. ewell Brands Inc., et al. (N.D. Ill.) (false advertising/mislabeling)
Burkhardt, et al. v. Moneylion echs, Inc., et al. (N.D. Fla.) (consumer protection)
In re Allian Life Insurance Co pany of orth A erica ata Incident Litig. (D. Minn.) (data breach)
In re: Apple Inc. App Store Si ulated Casino-Style Ga es Litig. In re: acebook, Inc. App Center Si ulated Casino-Style Ga es Litig. and In re: Google Play Store Si ulated Casino-Style Ga es Litig. (N.D. Cal.)
In Re: Bestway Above-Ground Pools Litig. (N.D. Ill.)
In Re: Change Healthcare, Inc. Custo er ata Security Breach Litig. (D. Minn.) (data breach)
In Re: M it Custo er ata Sec. Breach Litig. (D. Mass.) (data breach)
In Re Santa e atural obacco Co pany, Marketing, Sales Practice, and Products Liability Litig. (D.N.M.) (false advertising/mislabeling)
utraceutical ellness, Inc. Consu er raud Litig. (S.D.N.Y.) (false advertising/mislabeling)
Patterson v. , Inc. (N.D. Cal.) (consumer protection)

Professional Associations and Memberships:

Minnesota State Bar Association
American Bar Association
Federal Bar Association
Public Justice
The Sedona Conference

PW
PEARSON WARSHAW

KELSEY GATLIN DAVIES

Associate



Location: Sherman Oaks, California

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Email: kdavies@pwfirm.com

Kelsey Gatlin Davies is an associate attorney who specializes in consumer protection matters and class action litigation. She represents individuals and classes of consumers, on both state and nationwide bases, in cases involving unfair business practices, deceptive advertising, and defective products.

Ms. Davies is dedicated to achieving meaningful results for her clients. She has a history of litigation success in various federal courts, including appearances and favorable results in consumer class actions involving mislabeled and dangerously defective products. Most recently, she served as class counsel in a consumer protection case involving a baby bassinet, *A anda Marble, et al. v. Halo Innovations, Inc*., in which she was integral to achieving a $1.5 million nationwide settlement in the Southern District of New York. She also played an instrumental role in the successful litigation and resolution of *In Re Seresto lea and ick Collar Litigation*, where she served on the Plaintiffs' discovery committee, spearheading defensive discovery efforts including defending Class Representative depositions. For her class action work, Ms. Davies was recognized as a Top Plaintiff Attorney in Class Actions by CityView Magazine in 2025 and 2024. She was also awarded Top 40 Under 40 by The National Trial Lawyers in 2024 and 2023.

Before shifting her career to class actions, Ms. Davies played an key role in litigating and bringing resolution to the Kingston Coal Ash Spill Litigation, *Adkisson, et al. v. acobs ngineering Group, Inc*., a case involving over 300 victims of the largest industrial disaster in U.S. history, the 2008 Kingston Coal Ash Spill in Kingston, Tennessee. For her work on this matter, she, along with her colleagues, was selected as a finalist by Public Justice for Trial Lawyer of the Year in 2024.

Current Cases:

In Re: Snuga Litigation (false advertising/mislabeling) (W.D.N.Y.)
Seresto lea and ick Collar Manufacturing Sales Practices and Products Liability Litig. (false advertising/mislabeling) (N.D. Ill.)

Education:

University of Tennessee College of Law - J.D. – 2020
University of Tennessee Chattanooga - B.A. - 2014

Bar Admissions:

State of Tennessee
United States District Court for the Eastern District of Tennessee
United States District Court for the Middle District of Tennessee
United States District Court for the Northern District of Illinois

Professional Associations and Memberships:

National Trial Lawyers
Tennessee State Bar Association
Knoxville Bar Association
American Bar Association
Public Justice

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LaukaitisLaw

NATIONAL CLASS ACTION ATTORNEYS

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LaukaitisLaw

Laukaitis Law is a national plaintiffs' class action and complex litigation firm dedicated to protecting consumers and holding corporations accountable for conduct that causes widespread harm. The firm's practice focuses on consumer class actions and complex litigation arising from data privacy and cybersecurity incidents, product safety concerns, product recalls, false advertising, deceptive business practices, consumer fraud, and other forms of corporate misconduct.

Founded by Kevin Laukaitis, a Philadelphia native, Pennsylvania attorney, and graduate of Temple University Beasley School of Law, the firm was established on the belief that consumers deserve experienced, strategic, and efficient representation when large corporations fail to protect the interests of the individuals they serve. Under Mr. Laukaitis' leadership, Laukaitis Law has developed a nationwide consumer litigation practice handling hundreds of active matters and representing consumers throughout the United States. The firm has several attorneys and support staff experienced in litigating diverse class action cases.

The firm presently serves in court-appointed leadership roles in multiple complex privacy and data breach class actions pending before the United States District Court for the Eastern District of Pennsylvania and elsewhere within the Third Circuit. The firm's attorneys have been appointed to leadership positions and have served as lead or co-lead counsel, and in other leadership roles, in complex litigation involving data breaches, privacy violations, product safety concerns, deceptive business practices, false advertising, and emerging consumer protection issues. Through strategic case development and thoughtful litigation management, the firm has built a reputation for identifying and pursuing matters that raise significant public-interest concerns and meaningfully impact a wide range of consumers. The firm has substantial human, technological, and financial resources to prosecute complex class action litigation from investigation through class certification, summary judgment, trial, and appeal.

Laukaitis Law regularly collaborates with many of the nation's leading plaintiffs' firms in complex litigation, multidistrict proceedings, and coordinated actions. Through unwavering advocacy, practical litigation management, and a commitment to accountability, Laukaitis Law continues to pursue litigation that protects consumers, promotes product safety, safeguards privacy, and drives meaningful corporate change.

Since Laukaitis Law's founding, Mr. Laukaitis and his firm have served in prominent court-appointed leadership roles as class counsel or on executive committees for class actions nationwide. Representative court-appointed leadership appointments include the following:

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r d r d r , No. 2:24-cv-03411 (E.D. Pa.) (Court-appointed Interim Co-Lead Class Counsel).

A d r , No. 2:24-cv-03356 (E.D. Pa.) (Court-appointed Co-Lead Class Counsel; data breach litigation resulting in a $6.8 million common fund settlement despite Rite Aid's bankruptcy).

, No. 2:23-cv-05039 (E.D. Pa.) (Court-appointed Executive Committee member; data breach litigation resulting in a proposed $117.5 million common fund settlement).

r r d r , No. 2:24-cv-6818 (D.N.J.) (Court-appointed Co-Lead Class Counsel in nationwide data breach litigation affecting approximately 2.5 million individuals).

M M , No. 1:24-cv-00995 (N.D. Ga.) (Court-appointed Co-Lead Class Counsel; data breach litigation resulting in a $17.5 million common fund settlement).

AM r , No. 1:23-cv-02524-ALC (S.D.N.Y.) (Court-appointed Class Counsel; VPPA class action resulting in an $8 million common fund settlement).

Ar d , No. 1:23-cv-00236 (N.D. Ill.) (Court-appointed Co-Lead Counsel in deceptive advertising class action resulting in a $2 million common fund settlement for consumers nationwide);

r A r d No.1:25-cv-09570 (N.D. Ill.) (Court-appointed Co-Lead Counsel in product safety litigation that settled for a nationwide $15 million common fund) -



Founder & Managing Attorney

Kevin Laukaitis is the Founder and Managing Attorney of Laukaitis Law, where he focuses his practice on complex litigation involving consumer protection, data privacy and cybersecurity, product liability, product recalls, false advertising, and other matters arising from corporate misconduct.

For more than fifteen years, Mr. Laukaitis has represented consumers in class actions and other complex litigation throughout the United States. Courts throughout the country have appointed Mr. Laukaitis to leadership positions in data privacy, cybersecurity, consumer protection, and product safety litigation,

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recognizing his experience in case development, litigation management, and coordination of complex proceedings.

Mr. Laukaitis has developed particular experience in data privacy and cybersecurity litigation, product safety and recall litigation, and consumer protection matters involving deceptive marketing and unfair business practices. He has been appointed to leadership positions in significant litigation arising from some of the nation's most substantial data breaches and consumer controversies, and regularly collaborates with leading plaintiffs' firms throughout the country in complex litigation.

Mr. Laukaitis played significant roles in class actions that helped secure hundreds of millions of dollars in recoveries for consumers nationwide. His experience includes litigation involving consumer fraud, deregulated energy markets, data privacy, cybersecurity incidents, defective products, and product recalls. Throughout his career, he has been involved in all phases of litigation, including investigation, discovery, class certification, dispositive motion practice, mediation, settlement negotiations, and trial preparation.

Before founding Laukaitis Law LLC, Mr. Laukaitis gained experience in cutting-edge data privacy class actions, as part of the plaintiffs' attorney team that served as Co-Lead Trial Counsel, representing 68,000 individuals whose statutory rights were violated by the public dissemination of their criminal record history information. Mr. Laukaitis and his team prevailed in a jury trial, achieving an unprecedented settlement for Pennsylvania inmates booked or otherwise detained at the Bucks County Correctional Facility between 1938 and June 18, 2013. The case, , No. 12-cv 6867 (E.D. Pa.), is considered the first class action lawsuit in the United States to proceed to trial on the impact of digital criminal stigma and a government's statutory duties to protect.

As founder of Laukaitis Law, Mr. Laukaitis has built a national practice dedicated to protecting consumers, promoting product safety, safeguarding privacy, and holding corporations accountable when their conduct causes widespread harm. Courts have repeatedly entrusted him and his firm with leadership responsibilities because of his commitment to thoughtful advocacy, practical litigation management, and meaningful contributions to the matters in which he serves.

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, J.D.
, B.S., Business Administration

Ad Pennsylvania, New Jersey, Eastern District of Pennsylvania, District of New Jersey



A dr M
Of Counsel

Andreas E. Moffett concentrates his practice on product liability, product recalls, consumer protection, false advertising, and complex litigation.

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As a member of Laukaitis Law's litigation team, Andreas plays a significant role in the firm's nationwide consumer litigation practice. His work includes case investigation, motion practice, discovery, class certification briefing, and strategic case development across a broad range of matters involving product safety, consumer protection, and corporate accountability.

Andreas has developed particular experience in product liability and product recall litigation, including matters involving consumer products, children's products, household goods, and alleged product safety defects. He also contributes to litigation involving false advertising, deceptive business practices, and other consumer protection claims.

Before joining Laukaitis Law, Andreas practiced at Arnold & Porter, where he worked on sophisticated litigation matters involving complex legal and factual issues. His experience combines large-firm litigation training with a practical understanding of plaintiffs' litigation and consumer advocacy. Today, he works across the firm's active docket and contributes to all phases of litigation, helping advance matters from investigation through resolution.

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Ad District of Columbia



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Attorney

Natalia Perez Del Moral concentrates her practice on consumer protection, data privacy, cybersecurity, and complex litigation.

Natalia plays a significant role in the firm's nationwide consumer litigation practice and contributes to all phases of litigation, including motion practice, discovery, case development, mediation preparation, and settlement-related proceedings. Her work regularly involves matters arising from data breaches, privacy violations, consumer protection statutes, and other forms of corporate misconduct.

She has developed experience across a broad range of complex litigation matters and is particularly valuable in coordinating discovery efforts, analyzing legal and factual issues, preparing substantive briefing, and supporting mediation and settlement processes. Her ability to manage complex litigation demands across multiple matters makes her an integral member of the firm's litigation team.

Before joining Laukaitis Law, Natalia gained experience in complex litigation and class action matters at Napoli Shkolnik. Her background combines practical litigation experience with a strong understanding of the procedural and strategic demands of complex litigation.

LaukaitisLaw

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Ad District of Columbia



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Attorney

Maria Cristina Torres Short concentrates her practice on complex litigation, consumer protection, class actions, and federal court matters.

At Laukaitis Law, Maria Cristina contributes to the firm's nationwide consumer litigation practice through legal research, complaint review, pleading development, motion practice, and litigation strategy. She works with the firm's attorneys and litigation team to evaluate claims, develop cases, and prepare substantive filings across active matters.

Before joining Laukaitis Law, Maria Cristina practiced at O'Neill & Borges LLC, where she represented clients in commercial and civil litigation in the United States District Court for the District of Puerto Rico and in appellate matters before the United States Court of Appeals for the First Circuit. Her experience includes contract disputes, federal motion practice, procedural and jurisdictional issues, appellate filings, and coordination with national counsel. Her background provides her with experience handling matters at both the trial and appellate levels of federal litigation.

Maria Cristina earned her J.D. from the Inter American University of Puerto Rico School of Law, where she participated in litigation and advocacy competitions representing the law school.

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Inter American University of Puerto Rico School of Law, J.D.

Ad Puerto Rico

- Data Privacy & Cybersecurity
- Consumer Protection
- False Advertising
- Product Recall Litigation

LaukaitisLaw

- Product Liability
- Wiretapping & Tracking Technology Litigation
- Emerging Technology Consumer Litigation
- Consumer Fraud

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

IN RE: BESTWAY ABOVE-GROUND POOLS LITIGATION	Case No.: 1:25-cv-09570 **DECLARATION OF BRANDON SCHWARTZ IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL**

DECLARATION OF BRANDON SCHWARTZ IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL

I, Brandon Schwartz, declare as follows:

1. I serve as the Director of Notice at Eisner Advisory Group LLC ("EAG"), the Settlement Administrator appointed by the Court in the above-captioned action (the "Action") pursuant to the Order Granting Preliminary Approval of Class Action Settlement entered May 4, 2026 (ECF 63, ¶ 21) (the "Preliminary Approval Order"). I submit this Declaration in support of Plaintiffs' Motion for Final Approval. The statements set forth herein are based on my personal knowledge, on information provided to me by other EAG professionals working under my supervision, and on my review of records maintained by EAG in the ordinary course of administering this Settlement. If called as a witness, I could and would testify competently to the matters stated herein.

2. EAG is a full-service administration firm providing legal administration services, including the design, development, and implementation of unbiased complex legal notification programs. My professional background, qualifications, and class action experience are set forth in my Declaration Regarding Notice Plan and Settlement Administration entered April 30, 2026

(ECF 58), and the curriculum vitae submitted therewith.

3. EAG's duties as Settlement Administrator include implementing the Court-approved Notice Program; establishing and maintaining the Settlement Website and a dedicated toll-free hotline; receiving and tracking requests for exclusion and objections; receiving, reviewing, validating, and adjudicating claims, including fraud detection and de-duplication; corresponding with Class Members; and, following final approval, distributing Settlement benefits.

4. This Declaration reports on the status of the Notice Program, requests for exclusion, objections, and claims administration as of November 12, 2026. The Claims Deadline has been extended to November 19, 2026 (ECF 68). Because the Claims Period remains open, the claims figures reported below are interim and subject to change. EAG will continue to provide updates to the Parties and, if requested, will file a supplemental declaration with the Court.

NOTICE PROGRAM AS IMPLEMENTED

5. Defendant provided the Settlement Class List on July 22, 2026. The list contained 29,830 records, consisting of email addresses for Settlement Class Members identified in Defendants' business records. After processing, de-duplication, and address hygiene, the Settlement Class List identified 29,193 Settlement Class Member records. The Preliminary Approval Order directed EAG to commence Class Notice by the Notice Date, August 1, 2026, or soon thereafter (ECF 63, ¶ 22.a), and EAG commenced the Notice Program on that date. Because Defendants' records contained email addresses for only a limited portion of the estimated Settlement Class, the Notice Program was designed to achieve its reach primarily through internet publication notice, supported by direct email notice. EAG implemented the Notice Program described in my April 30, 2026 Declaration (ECF 58, ¶¶ 11–24), consisting of direct email notice, an internet publication notice, a press release, a Settlement Website, and a dedicated toll-free hotline.

6. **Direct Email Notice.** On August 1, 2026, EAG transmitted the Email Notice to all Settlement Class Members for whom a facially valid email address appeared in the Settlement

Class List. In total, 29,193 Email Notices were sent, of which 28,476 were successfully delivered and 717 were returned as bounced or otherwise undeliverable. Approximately 97.5% of the 29,193 Settlement Class Member records remaining after processing and address hygiene received direct Email Notice. A true and correct copy of the reminder email is attached hereto as **Exhibit A**.

7. **Internet Publication Notice.** Beginning on August 3, 2026, and continuing through September 1, 2026, EAG implemented an internet publication notice campaign, delivered programmatically through the Google Display Network and on the social media platforms Facebook and Instagram. EAG used adults who own an above-ground pool both as the campaign's primary target audience and as the audience against which it measured reach and frequency when planning the notice program. The campaign's secondary target audience was families with children. The notices appeared in English and Spanish.

8. On the Google Display Network, EAG used behavioral targeting to reach users who had shown interest in Bestway pools and above-ground pools, and contextual targeting to place notices alongside content related to those and similar topics. The notice appeared on sites such as parents.com, goodhousekeeping.com, weather.com, usatoday.com, and many others. On Facebook and Instagram, EAG used the same criteria plus interest-based targeting (for example, users who liked related pages) and engagement-based targeting (for example, users who clicked on, shared, or commented on related posts).

9. In total, the campaign generated 92,638,384 impressions, exceeding the more than 90 million impressions projected in my April 30, 2026 Declaration (ECF 58, ¶ 20). Screenshots of the internet notices are attached as **Exhibit B**.

10. **Press Release.** On August 4, 2026, EAG distributed a press release in English and Spanish over PR Newswire's US1 + Hispanic Newsline, which reaches more than 20,000 media contacts in the United States. The press release was picked up by 619 media contacts, as reflected in the visibility report, with a combined potential audience of approximately 102,100,000. Screenshots of the press release in English and Spanish, along with the visibility report, are

attached as **Exhibit C**.

11. **Amazon Notice.** Class Counsel informed EAG that they had engaged Counsel for Amazon to coordinate and send the short form notice to Amazon customers that purchased the Class Products through Amazon. It is EAGs understanding that Amazon issued notice to its purchasers on or around August 27, 2026 to 133,140 customers.

12. **Claims Stimulation Program.** On September 24, 2026, EAG and Counsel for the Parties discussed further outreach to Class Members to encourage additional claim submissions. Following that discussion, EAG implemented a multi-channel claims stimulation program consisting of email notice, internet publication notice, sponsored search listings, notice on class action aggregator websites, and notice through Amazon.

a. **Email Notice.** From September 24, 2026, through October 29, 2026, EAG sent four reminder emails to Settlement Class Members who had not filed a Claim as of the date of the reminder email notice. Additionally, EAG sent four email notices to individuals who had started but not completed a Claim. A true and correct copy of the reminder email is attached hereto as **Exhibit D**.

b. **Recall Participants.** On or about October 20, 2026, Defendant provided EAG with two additional lists containing 17,230 records of potential Settlement Class Members who inquired directly with Defendant about or participated in the recall. On October 22, 2026, EAG transmitted the Email Notice to 15,373 recall participants who were not included in the Settlement Class List and who had not already submitted a Claim. Additionally, EAG sent reminder emails to the recall participants on October 26 and October 28, 2026.

c. **Internet Publication Notice.** From September 28, 2026, through October 29, 2026, EAG implemented an internet publication notice campaign, delivered programmatically through the Google Display Network and the Basis Audience Network, and on Facebook, Instagram, and Reddit.

d. Across the programmatic platforms and on Facebook and Instagram, EAG used

a multi-level targeting strategy. First, EAG built a look-alike model from the list of valid Claims received as of September 24, 2026, which allowed the platforms to reach users who share characteristics with Class Members who had already filed Claims. Second, EAG matched the Settlement Class List against platform user data, so notices could be served directly to identified Class Members. EAG added the recall participants to the data match targeting for the remainder of the campaign. EAG also continued to use the targeting described in ¶¶ 7–8 above.

e. On Reddit, notice was targeted to sub-reddit categories that included r/pools, r/swimmingpools, r/abovegroundpools, and r/homeowners.

f. In total, the campaign generated 49,181,521 impressions. Screenshots of the internet notices are attached as **Exhibit E.**

g. **Sponsored Search Listings.** Beginning on September 28, 2026, and continuing through October 29, 2026, EAG ran sponsored search listings on Google, triggered by keywords including "Bestway Class Action," "Bestway Pool Settlement," "Bestway Refund," "Bestway Pool with Straps," "Bestway Recall," "Bestway Pool Safety," "Pool Supplies," "Backyard Pools," and other related terms. The listings generated 15,417 impressions. Screenshots of the sponsored search listings are attached as **Exhibit F.**

h. **Class Action Aggregator Websites**. EAG engaged Top Class Actions and OpenClassActions.org to distribute notice to their subscribers and website visitors. Top Class Actions featured the Settlement on its homepage from October 2 through October 9, 2026, and from October 16 through October 23, 2026; listed it on its Open Class Settlements page from October 2 through October 9, 2026, and from October 16 through October 30, 2026; included it in its daily newsletter to opt-in subscribers on October 6, October 16, and October 30, 2026; and posted it on its social media channels on October 18, 2026. Top

Class Actions also sent dedicated emails about the Settlement to its subscribers on September 30, 2026, and October 20, 2026, which were delivered to 879,319 and 1,007,826 recipients, respectively. OpenClassActions.org sent a custom email about the Settlement to its opt-in subscribers in three phases, beginning on or around October 12, October 19, and October 25, 2026. In total, OpenClassActions.org sent 1,476,422 emails across the three phases (415,996, 506,596, and 553,830, respectively). Screenshots are attached as **Exhibit G.**

i. **Amazon Notice.** Amazon agreed to send additional email notice to its customers who purchased the Class Products through Amazon. Amazon sent the initial email on October 5, 2026, and a reminder email on October 20, 2026, to each of 133,140 customers.

13. **Claims Deadline Extension.** On November 2, 2026, the Court approved extending the Claims Deadline to November 19, 2026 (ECF 68). To inform Settlement Class Members of the extended deadline, EAG developed a reminder campaign consisting of direct email notice, internet publication notice, additional notice through class action aggregator websites, and notice through Amazon. EAG has posted the Court's order and the revised deadline on the Settlement Website, has sent reminder email notice to Settlement Class Members and recall participants beginning on November 3, 2026, and has begun internet publication notice on November 7, 2026. The class action aggregator placements and Amazon notice are being scheduled to run before the Claims Deadline, and the campaign will continue through that date.

14. **Settlement Website and Toll-Free Hotline.** On July 31, 2026, EAG established a dedicated Settlement Website, www.poolsettlementbw.com, and a dedicated toll-free hotline, both of which it continues to maintain. Class Members can submit Claim Forms electronically through the website. The website also hosts the following documents: the Short Form and Long Form Notices and the Mail-In Claim Form, each in English and Spanish; the Second Consolidated Amended Class Action Complaint; the Settlement Agreement; the Preliminary Approval Order; Plaintiffs' Motion for Attorney Fees; and other related filings. The Exclusion Request Form was

also available on the website through the October 30, 2026 exclusion deadline. Visitors can also update their addresses, read answers to frequently asked questions, review important dates and deadlines, and find contact information for the Settlement Administrator. Following the Court's November 2, 2026, order extending the Claims Deadline, EAG updated the website to reflect the new deadline and posted the order.

15. The toll-free hotline, 1-855-789-5948, is available twenty-four hours a day, seven days a week. Callers can use an interactive voice response (IVR) system to hear information about the settlement. Callers can also speak with a live operator Monday through Friday, 9:00 a.m. to 6:00 p.m. Central Time, or leave a voicemail with specific questions or requests and receive a call back.

16. **Website and Hotline Activity.** As of November 12, 2026, the Settlement Website had received 2,494,514 unique visitors and 8,758,705 page views. The toll-free hotline had received 2,289 calls.

17. **Notice Program Reach.** EAG estimates that the Notice Program reached approximately 81.41% of the Settlement Class, with an average frequency of 3.01. This figure reflects the direct Email Notice and internet publication notice as originally implemented, from August 1, 2026, through September 1, 2026. The Amazon Notice was not part of the original Notice Plan (ECF 58, ¶¶ 11–24). Including it, based on Amazon's report that it sent notice to 133,140 customers on or around August 27, 2026, the Notice Program reached approximately 82.42% of the Settlement Class, with an average frequency of 3.03. Both figures exceed the 80% reach projected in my April 30, 2026 Declaration (ECF 58, ¶ 33) and fall within the 70–95% range that the Federal Judicial Center identifies as reasonable.

18. These reach estimates are conservative. Some components of the Notice Program, such as the press release, the Settlement Website, and the toll-free hotline, do not lend themselves to reliable reach measurement. The estimates also predate the additional outreach EAG conducted after the Notice Program, including the Claims Stimulation Program described in ¶ 12(a)–(i) and the outreach following the Claims Deadline extension described in ¶ 13. Each of these efforts has

provided Settlement Class Members with additional opportunities to learn of the Settlement, so actual reach is likely higher than the figures reported here.

19. Based on my experience and that of my team at EAG, it is my opinion that the Notice Program as implemented provided the best notice practicable under the circumstances, including individual notice to all Settlement Class Members who could be identified through reasonable effort, and satisfied the requirements of Fed. R. Civ. P. 23 and due process.

REQUESTS FOR EXCLUSION AND OBJECTIONS

20. Under the Preliminary Approval Order, the deadline to request exclusion and the deadline to object to the Settlement are both October 30, 2026 (ECF 63, ¶¶ 28, 30).

21. EAG maintains a dedicated Post Office Box for requests for exclusion submitted by mail and accepts requests submitted online through the Settlement Website. EAG monitors both on an ongoing basis. As of November 12, 2026, EAG has received 35 requests for exclusion from the Settlement Class. Copies of the exclusion requests have been provided to counsel for the Parties and are attached hereto as **Exhibit H.**

22. Under the Settlement Agreement, a Settlement Class Member who wishes to object must file a written objection on the Court's docket and send a copy to counsel for the Parties and EAG by the Objection Deadline (S.A. § V.17). As of November 12, 2026, EAG has not received any objections by mail or email. Through its monitoring of the docket, EAG identified one objection filed with the Court on September 16, 2026 (ECF 64). EAG did not receive a copy of this objection from the objector.

23. EAG will report any additional requests for exclusion or objections received before the Final Approval Hearing.

CLAIMS RECEIVED AND CLAIMS REVIEW

24. As of November 12, 2026, EAG has received 1,052,315 Claim submissions, of which 76,662 have been determined to be preliminarily valid, representing an estimated 3.07% of the Settlement Class. Table 1 below provides summary statistics of claims received. Table 2 below provides an overview of the current review status of preliminarily valid Claims and

associated supporting documentation. EAG is coordinating with both Parties on the Claims review and validation process. EAG's review of the remaining pending Claims is ongoing and will provide an updated claims report in advance of the Final Approval Hearing. Claim Forms must be submitted online or postmarked by November 19, 2026 to be timely (ECF 68).

Table 1: Claim Submission Summary			
Description	**Claimed**	**With Proof of Purchase**	**Without Proof of Purchase**
Total Claims Submitted	**1,052,315**	**116,287**	**936,028**
(-) High Confidence Fraud - Bot activity or invalid payment details	876,549	73,518	803,031
(-) Suspected Fraud - Other Fraud Indicators	76,505	13,787	62,718
(-) Duplicate or Invalid	11,022	659	10,363
(-) Pending Validation	11,577	1,016	10,561
(=) Preliminary Valid	**76,662**	**27,307**	**49,355**

Table 2: Estimated Payments on Preliminary Valid Claims			
Description	**Claims**	**Estimated Payment**	**Up to 2x Payment per SA § VI.2.B**
With Proof of Purchase (10% of price)	14,252	$887,374	$1,774,749
With Proof of Purchase (Deficient - Defaulted to $40)	10,400	$416,000	$832,000
With Proof of Purchase (Under Review)	2,655	$106,200	$212,400
Without Proof of Purchase ($40)	49,355	$1,974,200	$3,948,400
Total Preliminary Valid	**76,662**	**$3,383,774**	**$6,767,549**

25. **Fraud Procedures and Analysis.** To combat rampant fraud in class action settlements and protect the interests of valid claimants, EAG employs a three-tiered defense strategy that combines technology with human oversight. EAG's first line of defense is an advanced machine learning supported Web Application Firewall ("WAF"). This WAF is continuously updated in real time based on insights from the global network, ensuring proactive protection against emerging threats. The second tier of EAG's defense utilizes sophisticated AI algorithms to detect and mitigate bot and scripted browser traffic, effectively distinguishing between legitimate and malicious activities to prevent attacks like credential stuffing in real time.

These algorithms compare data across all active case websites allowing EAG to identify patterns and bad actors across tens of millions of website interactions. EAGs third and most comprehensive line of defense involves a team of dedicated fraud prevention specialists who employ a proprietary, multifaceted approach. This includes AI-powered fuzzy matching to identify abnormal patterns indicative of fraud, digital fingerprint verification, and comprehensive monitoring of suspicious IPs and domains across all cases.

26. To further strengthen fraud review in this Action, EAG used ClaimScore, Covalynt's proprietary claim validation and fraud detection platform, as described in my April 30, 2026 Declaration (ECF 58, ¶¶ 26–27). Each Claim is reviewed through both EAG's three-tiered fraud mitigation process and ClaimScore's scoring system, which evaluates each Claim individually against 65 criteria.

27. **High Confidence and Suspected Fraud Claims.** Through the procedures outlined above, EAG and its Covalynt identified 929,946 total submissions that display known characteristics of automated claim submissions and other indicators of abuse or contain indicators that suggest the claim is likely fraudulent. High Confidence Fraud claims consist of submissions with indicators that include but are not limited to instances where ClaimScore has verified that the claimant's name and contact information do not exist, claims identified by the AI algorithm as verified bot submissions, submitted with altered or AI generated supporting documentation, and/or the IP is registered to a foreign Internet Service Provider. Suspicious fraud claims consist of submissions that exhibit similar characteristics as High Confidence Fraud claims and that are identified by the AI algorithm as likely bot submissions or by Covalynt as a likely mismatch. Based on my experience and detailed review of claims flagged as High Confidence Fraud, such submissions appear to be invalid and not from Class Members and should be denied (S.A. § IV.5). Claims identified as suspected fraud should receive a Deficiency Notice to validate the Claim submission (S.A. §§ I.25, V.8).

NOTICE AND ADMINISTRATION COSTS

28. As of November 12, 2026, EAG has incurred $303,830.40 in notice and

administration fees and costs, and EAG estimates that total notice and administration costs through the completion of the administration will be $430,000.00, within the approximately $437,770 in Settlement Agreement Costs estimated in the Settlement Agreement (S.A. § V.15).

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

Executed this 13th day of November, 2026 in Portland, Oregon.



Brandon Schwartz

Exhibit A: Email Notice

Settlement Claim ID:

If you purchased a 48-inch or taller Bestway above-ground pool with straps running to the outside of the vertical legs since 2008, you may be entitled to benefits from a class action Settlement.

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

This notice is only a summary of the key Settlement terms. The Settlement Agreement and Long Form Notice are available on the Settlement Website at www.PoolSettlementBW.com or by calling 1-855-789-5948.

A proposed settlement has been reached in a class action lawsuit against Bestway (USA) Inc. ("Bestway USA"), Bestway Inflatables & Material Corp. ("Bestway Inflatables"), and Bestway (Hong Kong) International Ltd ("Bestway Hong Kong") (collectively "Bestway" or "Defendants") relating to an alleged safety defect that creates a potential drowning hazard. The case is titled In re: Bestway Above-Ground Pools Litigation, No. 1:25-cv-09570 (N.D. Ill.). The settlement is not an admission of liability and does not release claims for personal injury or property damage. Additionally, nothing in this agreement modifies, limits, or extinguishes the July 21, 2025 Recall related to the at-issue Pools, which remains in effect independent of this Settlement, and which is neither endorsed by nor incorporated into this Settlement.

Who is included in the Settlement?

You are part of the Settlement Class if you purchased for personal use and not for resale from a store or other commercial retailer—not second-hand, a Bestway-branded pool 48 inches in height or taller (including Power Steel and Steel Pro models) with compression straps located outside of the support poles, sold from 2008 through May 4, 2026.

What are the Settlement Benefits?

The Settlement makes available to Settlement Class Members $15,000,000, which is structured to cover and include payments and distributions to eligible Settlement Class Members, Notice and Administrative Costs, Attorneys' Fees and Expenses (not to exceed one-third of the Settlement Amount), and Service Awards of $2,500 to each of the named Plaintiffs.

How do I receive a payment from the Settlement?

Settlement Class Members must submit a Claim Form online at www.PoolSettlementBW.com or by mail postmarked by October 30, 2026 to the Settlement Administrator at Bestway Settlement Administrator, P.O. Box 1869, Baton Rouge, LA 70821. Claim forms are also available by calling 1-855-789-5948 or by emailing info@poolsettlementBW.com. Class Members who submit a Valid Claim will have several electronic payment options to choose from, or you can elect to receive a check.

What are my Options?

Submit a Claim Form: If you submit a Claim Form, you may receive a monetary award but will not be able to sue or continue to sue the Defendants about the claims resolved by this Settlement.

Exclude Yourself: If you do not want to be legally bound by the Settlement, you must exclude yourself; you will not receive any monetary Settlement benefits, but you will keep your right to sue the Defendants in a separate lawsuit about the claims resolved by this Settlement.

Object: If you do not exclude yourself, you can object to the Settlement. Any Settlement Class Member who does not submit a timely and valid objection gives up the right to object or to speak at the Final Approval Hearing. You will be bound by the Settlement Agreement and will no longer be able to make any objection to the Settlement.

Complete details on how to exclude yourself or object to the Settlement are available at www.PoolSettlementBW.com. The deadline to exclude yourself or object is **October 30, 2026.**

Do Nothing: If you do nothing, you will remain in the class, you will not be eligible for monetary benefits, and you will be bound by the decision of the Court and give up your rights to sue Defendants for the claims resolved by this Settlement.

Has the Court approved the Settlement?

No. The Court will hold a Final Approval Hearing on **November 20, 2026, at 10:00 a.m., CDT**, before the Honorable Lindsey C. Jenkins of the United States District Court for the Northern District of Illinois, 219 South Dearborn Street, Courtroom 2119, Chicago, IL 60604, to determine whether the Settlement is fair, reasonable, and adequate, and to consider attorney Fee Awards and Service Awards ($2,500

each) to the Settlement Class Representatives**.** Class Counsel's Motion for Attorney Fee Awards will be available on the Settlement Website after it is filed with the Court. If there are objections, the Court will consider them.

You or your own lawyer, if you have one, may ask to appear and speak at the hearing at your own cost, but it is not required. You do not need to attend the hearing to receive benefits.

How do I get more Information?

This notice is only a summary. For additional information, please visit www.PoolSettlementBW.com or call toll-free 1-855-789-5948. You may also write to the Settlement Administrator at Bestway Settlement Administrator, P.O. Box 1869, Baton Rouge, LA 70821.

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Exhibit B: Internet Publication Notice

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Lower mortgage rates can mean the difference between buying a good house and a great one.



Which home upgrades lower energy bills? What experts say to do first

If your air conditioning is working harder than it needs to, projects like air sealing and attic insulation can help keep energy bills down.

MONEY

STORY OF THE DAY

How to save garden seeds now and spend less on planting next spring

Want to grow your own garden from seed? Learn the best time to harvest and how to store them for next spring.



Kathryn Gregory
Yew Dell Botanical Gardens



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Top Stories

These dorm room essentials will save your sanity on move in day

Ahead of move-in day, we compiled a list of the top dorm room essentials to help your transition to college easier. Here's the full list:

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Need an extra bed fast? This queen air mattress inflates in 3 minutes

The iDOO Queen Air Mattress with Built-In Pump is on sale for $67.49. See why shoppers love its quick inflation, raised design and durable construction.

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I tried a bidet, and I am never going back to regular toilet paper

Looking for the best budget bidet? This easy-to-install non-electric bidet features dual self-cleaning nozzles and a built-in deodorizer.

SHOPPING

I want everything from Joanna Gaines' fall Target collection

Target's latest Joanna Gaines collection is filled with fall-ready favorites. See the standout decor pieces, kitchen upgrades and must-shop arrivals.

SHOPPING

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Atlanta Weather

Atlanta, Georgia · As of 5:26 PM EDT

84°

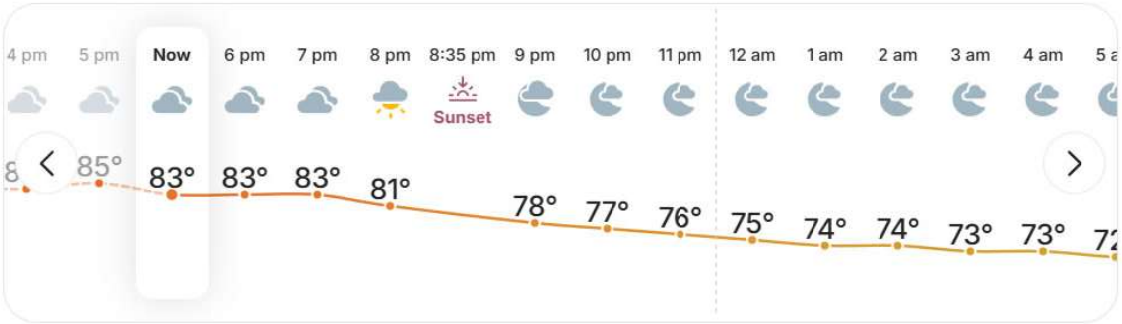
Cloudy

Feels Like 87° | High 86° | Low 71°

Chance of Rain 15% | 0 in

Today's Outlook

Tonight's low temperature will be nearly the same as last night's.



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Your News







Editor's Pick




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BY SHELBY DEERING
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LIFE

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They shopped vibrant necklaces, skincare, travel gear, and more.
BY ISABELLA CAVALLO
Jul 27, 2026
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MLB trade deadline tracker, intel and analysis: What will go down in the final hour of dealing?
ARIZONA DIAMONDBACKS 2m - ESPN

MLB trade grades: Red Sox add Rutschman, Bucs get Weaver from Mets
BOSTON RED SOX 20m - Bradford Doolittle and Da...

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Sources: O's trade All-Star C Rutschman to BoSox
BALTIMORE ORIOLES 3h

Harper to outfield amid Phillies' shuffle for Arraez
PHILADELPHIA PHILLIES 2h

Sources: Cubs acquiring RHP Holmes from Mets
CHICAGO CUBS 27m

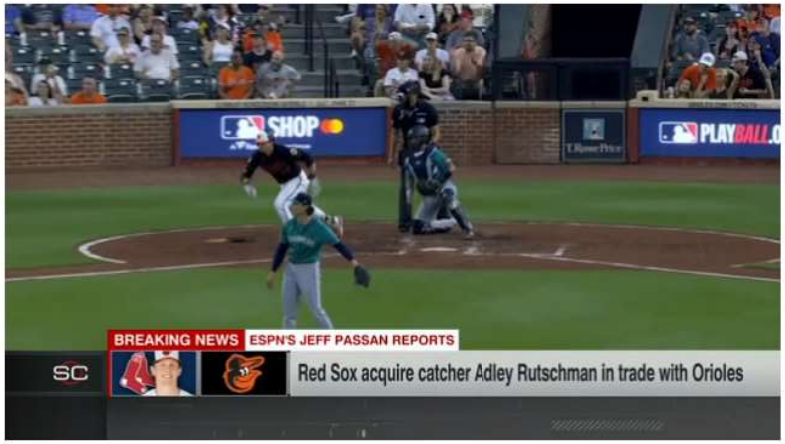
Padres acquire Giants' Ray to help rotation woes
SAN DIEGO PADRES 3h

Astros acquire lefty-hitting OF Varsho from Jays
HOUSTON ASTROS 1h

Source: Brewers acquire May, Romero from Cards
ST. LOUIS CARDINALS 1h

Jays trade for Angels' Soriano to bolster rotation
TORONTO BLUE JAYS 8h

2026 MLB trade deadline tracker: Rumors, news, analysis



ESPN
Aug 3, 2026, 05:25 PM ET

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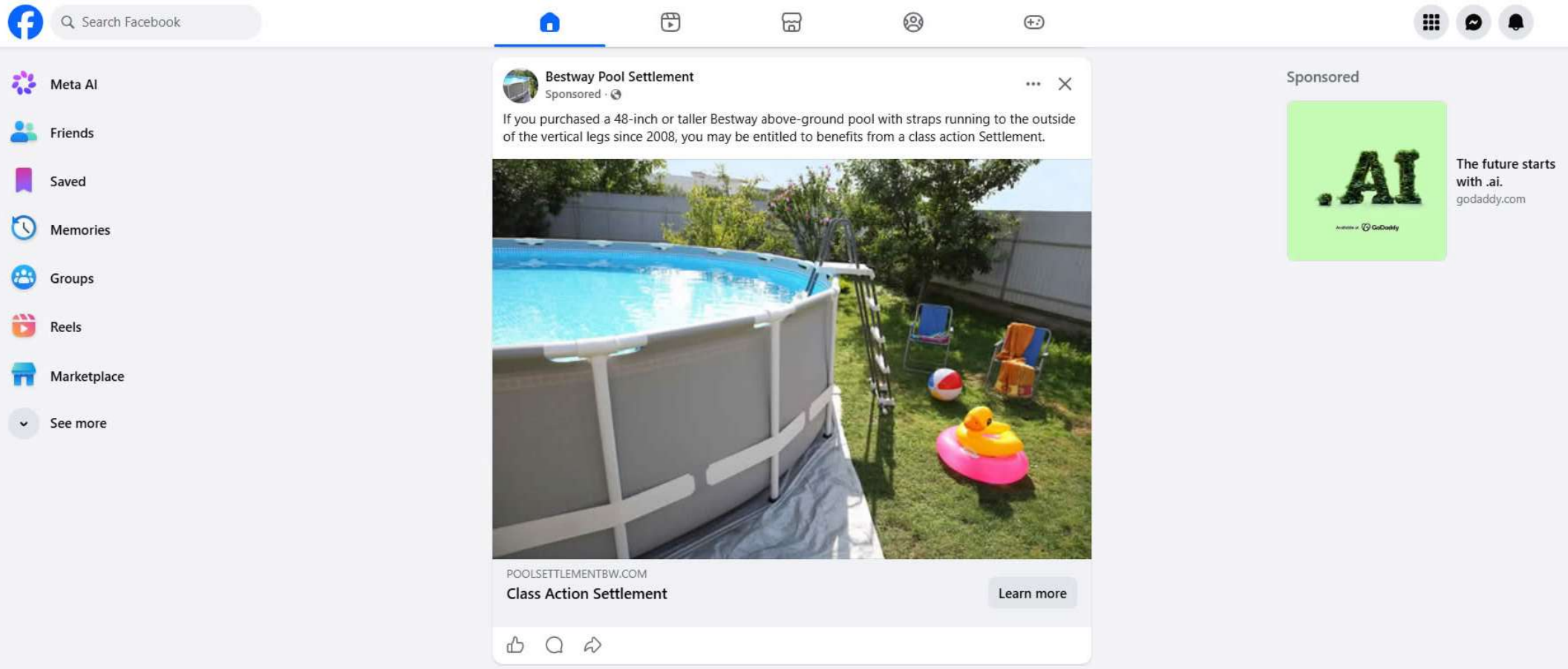
The 2026 MLB trade deadline is fast approaching, with contending teams deciding what they need to add before 6 p.m. ET on Monday.

The big deal of the weekend came Saturday night, with Tarik Skubal on the move -- and headed to the two-time defending champion Los Angeles Dodgers. The Boston Red Sox made the biggest splash on deadline day, acquiring catcher Adley Rutschman from the Baltimore Orioles. The Chicago Cubs (Clay Holmes), the Philadelphia Phillies (Luis Arraez) and Milwaukee Brewers (Dustin May) are among the contenders who have added on Monday.

Whether your team is adding or dealing stars -- or lands somewhere in between -- here's the latest intel we're hearing, reaction to completed deals and what to know for every club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If you purchased a 48-inch or taller Bestway above-ground pool with straps running to the outside of the vertical legs since 2008, you may be entitled to benefits from a class action Settlement.

Exhibit C: Press Release

If you purchased a 48-inch or taller Bestway above-ground pool with straps running to the outside of the vertical legs since 2008, you may be entitled to benefits from a class action Settlement.

USA English

NEWS PROVIDED BY
Bestway Settlement Administrator →
Aug 04, 2026, 00:18 ET

SHARE THIS ARTICLE

CHICAGO, Aug. 4, 2026 /PRNewswire/ -- The following notice is being issued by the Court approved Settlement Administrator and has been authorized by the U.S. District Court for the Northern District of Illinois, *In re: Bestway Above-Ground Pools Litigation*, Case No. 1:25-cv-09570.

A proposed settlement has been reached in a class action lawsuit against Bestway (USA) Inc. ("Bestway USA"), Bestway Inflatables & Material Corp. ("Bestway Inflatables"), and Bestway (Hong Kong) International Ltd ("Bestway Hong Kong") (collectively "Bestway" or "Defendants") relating to an alleged safety defect that creates a potential drowning hazard. The case is titled *In re: Bestway Above-Ground Pools Litigation*, No. 1:25-cv-09570 (N.D. Ill.). The settlement is not an admission of liability and does not release claims for personal injury or property damage. Additionally, nothing in this agreement modifies, limits, or extinguishes the July 21, 2025 Recall related to the at-issue Pools, which remains in effect independent of this Settlement, and which is neither endorsed by nor incorporated into this Settlement.



Above-ground pool with straps running to the outside of the vertical legs.

Who is included in the Settlement?

You are part of the Settlement Class if you purchased for personal use and not for resale from a store or other commercial retailer—not second-hand, a Bestway-branded pool 48 inches in height or taller (including Power Steel and Steel Pro models) with compression straps located outside of the support poles, sold between 2008 and 2024.

What are the Settlement benefits?

The Settlement makes available to Settlement Class Members $15,000,000, which is structured to cover and include payments and distributions to eligible Settlement Class Members, Notice and Administrative Costs, Attorneys' Fees and Expenses (not to exceed one-third of the Settlement Amount), and Service Awards of $2,500 to each of the named Plaintiffs.

How do I receive a payment from the Settlement?

Settlement Class Members must submit a Claim Form online at **www.PoolSettlementBW.com** or by mail postmarked by **October 30, 2026** to the Settlement Administrator at Bestway Settlement Administrator, P.O. Box 1869, Baton Rouge, LA 70821. Claim forms are also available by calling 1-855-789-5948 or by emailing info@poolsettlementBW.com. Class Members who submit a Valid Claim will have several electronic payment options to choose from, or you can elect to receive a check.

What are my options?

Submit a Claim Form: If you submit a Claim Form, you may receive a monetary award but will not be able to sue or continue to sue the Defendants about the claims resolved by this Settlement.

Exclude Yourself: If you do not want to be legally bound by the Settlement, you must exclude yourself; you will not receive any monetary Settlement benefits, but you will keep your right to sue the Defendants in a separate lawsuit about the claims resolved by this Settlement.

Object: If you do not exclude yourself, you can object to the Settlement. Any Settlement Class Member who does not submit a timely and valid objection gives up the right to object or to speak at the Final Approval Hearing. You will be bound by the Settlement Agreement, and will no longer be able to make any objection to the Settlement.

Complete details on how to exclude yourself or object to the Settlement are available at **www.PoolSettlementBW.com**. The deadline to exclude yourself or object is **October 30, 2026**.

Do Nothing: If you do nothing, you will remain in the class, you will not be eligible for monetary benefits, and you will be bound by the decision of the Court and give up your rights to sue Defendants for the claims resolved by this Settlement.

Has the Court approved the Settlement?

No. The Court will hold a Final Approval Hearing on November 20, 2026, at 10:00 a.m. CT, before the Honorable Lindsey C. Jenkins of the United States District Court for the Northern District of Illinois, 219 South Dearborn Street, Courtroom 2119, Chicago, IL 60604, to determine whether the Settlement is fair, reasonable, and adequate, and to consider attorney Fee Awards and Service Awards ($2,500 each) to the Settlement Class Representatives. Class Counsel's Motion for Attorney Fee Awards will be available on the Settlement Website after it is filed with the Court. If there are objections, the Court will consider them.

You or your own lawyer, if you have one, may ask to appear and speak at the hearing at your own cost, but it is not required. You do not need to attend the hearing to receive benefits.

How do I get more information?

This notice is only a summary. For additional information, please visit **www.PoolSettlementBW.com** or call toll-free **1-855-789-5948**. You may also write to the Settlement Administrator at Bestway Settlement Administrator, P.O. Box 1869, Baton Rouge, LA 70821.

SOURCE Bestway Settlement Administrator



Also from this source



Si compró una piscina elevada Bestway de 48 pulgadas o más de altura con correas que se extienden hacia el exterior de las patas verticales a partir de 2008, es posible que tenga derecho a recibir beneficios derivados de un Acuerdo de demanda colectiva.

La siguiente notificación ha sido emitida por el Administrador del Acuerdo aprobado por el Tribunal y ha sido autorizada por el Tribunal de Distrito...

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Si compró una piscina elevada Bestway de 48 pulgadas o más de altura con correas que se extienden hacia el exterior de las patas verticales a partir de 2008, es posible que tenga derecho a recibir beneficios derivados de un Acuerdo de demanda colectiva.

NEWS PROVIDED BY
Bestway Settlement Administrator
Aug 04, 2026, 01:16 ET

Chicago, 4 de agosto de 2026 /PRNewswire-HISPANIC PR WIRE/ -- La siguiente notificación ha sido emitida por el Administrador del Acuerdo aprobado por el Tribunal y ha sido autorizada por el Tribunal de Distrito de los Estados Unidos para el Distrito Norte de Illinois, en los autos: *In re: Bestway Above-Ground Pools Litigation* (Autos caratulados: Litigio sobre las piscinas elevadas Bestway), Caso N.° 1:25-cv-09570.

Se ha llegado a una propuesta de acuerdo en una demanda colectiva contra Bestway (USA) Inc. ("Bestway USA"), Bestway Inflatables & Material Corp. ("Bestway Inflatables") y Bestway (Hong Kong) International Ltd ("Bestway Hong Kong") (en forma conjunta denominadas "Bestway" o las "Demandadas") en relación con un supuesto defecto de seguridad que supone un riesgo potencial de ahogamiento. El caso se titula *In re: Bestway Above-Ground Pools Litigation*, (Autos caratulados: Litigio sobre las piscinas elevadas Bestway), N.° 1:25-cv-09570 (N.D. Ill.). El acuerdo no constituye un reconocimiento de responsabilidad y no exime de reclamos por lesiones personales o daños materiales. Además, nada de lo dispuesto en este acuerdo modifica, limita o extingue el Retiro del Mercado del 21 de julio de 2025 relacionado con las Piscinas en cuestión, el cual continúa vigente independientemente de este Acuerdo, y el cual no está avalado ni incorporado en este Acuerdo.



Above-ground pool with straps running to the outside of the vertical legs.

¿Quién está incluido en el Acuerdo?

Usted es parte del Colectivo del Acuerdo si compró, para uso personal y no para reventa, en una tienda u otro comercio minorista —no de segunda mano— una piscina de la marca Bestway de 48 pulgadas de altura o más (incluidos los modelos Power Steel y Steel Pro) con correas de compresión situadas en el exterior de las barras de soporte, vendida entre 2008 y 2024.

¿Cuáles son los beneficios del Acuerdo?

El Acuerdo pone a disposición de los Miembros del Colectivo del Acuerdo la suma de $15.000.000, que se ha estructurado para cubrir e incluir los pagos y distribuciones a los Miembros del Colectivo del Acuerdo que cumplan los requisitos, los costos de Notificación y Administración, los Honorarios y Gastos de los Abogados (por hasta un máximo de un tercio del Monto del Acuerdo), y Retribuciones por Servicios de $2.500 para cada uno de los Demandantes nominados.

¿Cómo puedo recibir un pago del Acuerdo?

Los Miembros del Colectivo del Acuerdo deben presentar un Formulario de Reclamo en línea en **www.PoolSettlementBW.com** o por correo, con sello postal fechado a más tardar el **30 de octubre de 2026** , dirigido al Administrador del Acuerdo a Bestway Settlement Administrator, P.O. Box 1869, Baton Rouge, LA 70821. Los formularios de reclamo también pueden obtenerse llamando al 1-855-789-5948 o enviando un correo electrónico a **info@poolsettlementBW.com**. Los Miembros del Colectivo que presenten un Reclamo Válido tendrán varias opciones de pago electrónico para elegir, o pueden optar por recibir un cheque.

¿Qué opciones tengo?

Presentar un Formulario de Reclamo: Si presenta un Formulario de Reclamo, es posible que reciba una compensación monetaria, pero no podrá demandar ni continuar con la demanda contra las Demandadas en relación con los reclamos que resuelve este Acuerdo.

Excluirse: Si no desea quedar legalmente obligado por el Acuerdo, debe excluirse del mismo; no recibirá ningún beneficio monetario derivado del Acuerdo, pero conservará su derecho a demandar a las Demandadas en un juicio por separado en relación con los reclamos resueltos por este Acuerdo.

Oponer objeciones: Si no se excluye, puede oponer objeciones al Acuerdo. Todo Miembro del Colectivo del Acuerdo que no oponga una objeción válida dentro del plazo establecido renuncia al derecho de oponerse o de hacer uso de la palabra en la Audiencia de Aprobación Definitiva. Usted quedará obligado por el Acuerdo de Conciliación y ya no podrá oponer ninguna objeción al mismo.

Los detalles completos sobre cómo excluirse u oponer objeciones al Acuerdo pueden consultarse en **www.PoolSettlementBW.com**. La fecha límite para excluirse u oponer objeciones al Acuerdo es el **30 de octubre de 2026**.

No hacer nada: Si no hace nada, usted permanecerá en el colectivo de demandantes, no tendrá derecho a recibir beneficios monetarios y quedará obligado por las decisiones del Tribunal; además, renunciará a sus derechos a entablar acciones legales contra las Demandadas por los reclamos que resuelve este Acuerdo.

¿El Tribunal ha aprobado el Acuerdo?

No. El Tribunal celebrará una Audiencia de Aprobación Definitiva el 20 de noviembre de 2026, a las 10:00 a. m., hora central, ante la Honorable Jueza Lindsey C. Jenkins, del Tribunal de Distrito de los Estados Unidos para el Distrito Norte de Illinois, 219 South Dearborn Street, Sala 2119, Chicago, IL 60604, para determinar si el Acuerdo es justo, razonable y adecuado, y para considerar la aprobación de Honorarios de Abogados y Retribuciones por Servicios ($2.500) para los Representantes del Colectivo del Acuerdo. El escrito de Solicitud de Honorarios de Abogados presentado por los Abogados del Colectivo estará disponible en el Sitio Web del Acuerdo una vez que se haya presentado ante el Tribunal. Si hay objeciones, el Tribunal las considerará.

Usted o su propio abogado, si lo tiene, pueden solicitar comparecer y hacer uso de la palabra en la audiencia a su propio costo, pero no están obligados a hacerlo. No es necesario que asista a la audiencia para recibir beneficios.

¿Cómo puedo obtener más información?

Esta notificación es solo un resumen. Para obtener más información, visite **www.PoolSettlementBW.com** o llame gratis al **1 855 789 5948**. También puede escribir al Administrador del Acuerdo a Bestway Settlement Administrator, P.O. Box 1869, Baton Rouge, LA 70821.

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	WANE [Fort Wayne, IN]	589,947	US	English	Broadcast Med...	Media & Infor...
	WATE [Knoxville, TN]	562,429	US	English	Broadcast Med...	Media & Infor...
	WKBN-TV CBS-27 [Youngs...	553,385	US	English	Broadcast Med...	Media & Infor...
	KARK-TV NBC-4 [Little Roc...	529,385	US	English	Broadcast Med...	Media & Infor...
	WKOW 27, Madison, Wisco...	515,582	US	English	Newspaper	Media & Infor...
	Wisconsin State Journal, M...	506,169	US	English	Newspaper	Media & Infor...

	KSNT-TV NBC-27 [Topeka,...	459,889	US	English	Broadcast Med...	Media & Infor...
	KAKE [Wichita, KS]	449,789	US	English	Broadcast Med...	Media & Infor...
	KELO [Sioux Falls, SD]	442,426	US	English	Broadcast Med...	Media & Infor...
	KHON [Honolulu, HI]	427,881	US	English	Broadcast Med...	Media & Infor...
	WROC/WUHF/WZDX [Roc...	427,795	US	English	Broadcast Med...	Media & Infor...
	KTXL [Sacramento, CA]	401,675	US	English	Broadcast Med...	Media & Infor...
	WIVB [Buffalo, NY]	383,881	US	English	Broadcast Med...	Media & Infor...
	WDVM-TV IND-25 [Washin...	378,891	US	English	Broadcast Med...	Media & Infor...
	WJZY-TV FOX-46 [Charlott...	377,924	US	English	Broadcast Med...	Media & Infor...
	WSPA/WYCW [Spartanbur...	370,772	US	English	Broadcast Med...	Media & Infor...
	WHNT [Huntsville, AL]	345,653	US	English	Broadcast Med...	Media & Infor...
	WSYR-TV ABC-9 NewsCh...	344,720	US	English	Broadcast Med...	Media & Infor...
	WTRF [Wheeling, WV]	329,301	US	English	Broadcast Med...	Media & Infor...
	WCIA-TV CBS 3 [Champai...	318,250	US	English	Broadcast Med...	Media & Infor...
	KSEE/KGPE [Fresno, CA]	312,833	US	English	Broadcast Med...	Media & Infor...
	WHO-TV NBC-13 [Des Moi...	304,403	US	English	Broadcast Med...	Media & Infor...
	WKRG [Mobile, AL]	303,528	US	English	Broadcast Med...	Media & Infor...
	Lincoln Journal Star, Lincol...	293,230	US	English	Newspaper	Media & Infor...
	WDTN/WBDT [Dayton, OH]	292,811	US	English	Broadcast Med...	Media & Infor...
	KOLR/KOZL [Springfield, M...	290,016	US	English	Broadcast Med...	Media & Infor...
	WTAJ [Altoona, PA]	282,134	US	English	Broadcast Med...	Media & Infor...
	KTAL-TV NBC-6 [Shrevepo...	270,256	US	English	Broadcast Med...	Media & Infor...
	KGET [Bakersfield, CA]	268,172	US	English	Broadcast Med...	Media & Infor...
	WFRV [Green Bay, WI]	264,158	US	English	Broadcast Med...	Media & Infor...
	WBOY [Clarksburg, WV]	256,237	US	English	Broadcast Med...	Media & Infor...
	KNWA/KFTA [Fayetteville, ...	252,467	US	English	Broadcast Med...	Media & Infor...
	WBTW [Myrtle Beach, SC]	248,699	US	English	Broadcast Med...	Media & Infor...
	WSAV [Savannah, GA]	239,900	US	English	Broadcast Med...	Media & Infor...
	Hometown Source, Ramse...	238,243	US	English	Newspaper	Media & Infor...
	KXRM [Colorado Springs, ...	237,585	US	English	Broadcast Med...	Media & Infor...
	WOWK-TV CBS-13 [Charle...	233,656	US	English	Broadcast Med...	Media & Infor...
	WLNS-TV CBS-6 [Lansing, ...	224,325	US	English	Broadcast Med...	Media & Infor...
	KWWL News 7, Waterloo, I...	222,589	US	English	Newspaper	Media & Infor...
	WJTV-TV CBS-12 [Jackson,...	219,379	US	English	Broadcast Med...	Media & Infor...

	KIAH [Houston, TX]	217,528	US	English	Broadcast Med...	Media & Infor...
	WDKY-TV FOX-56 [Lexingt...	215,067	US	English	Broadcast Med...	Media & Infor...
	WMBD-TV CBS 31 / WYZZ-...	213,583	US	English	Broadcast Med...	Media & Infor...
	Killeen Daily Herald, Killee...	206,185	US	English	Newspaper	Media & Infor...
	WIAT [Birmingham, AL]	200,956	US	English	Broadcast Med...	Media & Infor...
	KAMC/KLBK	190,569	US	English	Broadcast Med...	Media & Infor...
	WJET-TV ABC-24 / WFXP-...	189,023	US	English	Broadcast Med...	Media & Infor...
	WJBF [Augusta, GA]	184,790	US	English	Broadcast Med...	Media & Infor...
	WMBB-TV ABC-13 [Panam...	179,128	US	English	Broadcast Med...	Media & Infor...
	News-Gazette, Champaign...	177,532	US	English	Newspaper	Media & Infor...
	WQRF/WTVO [Rockford, IL]	173,130	US	English	Broadcast Med...	Media & Infor...
	WCBD-TV NBC-2 [Charlest...	169,181	US	English	Broadcast Med...	Media & Infor...
	KLFY [Lafayette, LA]	165,916	US	English	Broadcast Med...	Media & Infor...
	KTBS 3, Shreveport, Louisi...	161,408	US	English	Newspaper	Media & Infor...
	Telegraph Herald, Dubuqu...	157,477	US	English	Newspaper	Media & Infor...
	WETM-TV NBC-18 [Elmira, ...	150,368	US	English	Broadcast Med...	Media & Infor...
	WGNO [New Orleans, LA]	149,894	US	English	Broadcast Med...	Media & Infor...
	Greater Milwaukee Today, ...	143,442	US	English	Newspaper	Media & Infor...
	KETK-TV FOX-51 [Tyler, TX]	139,486	US	English	Broadcast Med...	Media & Infor...
	WAOW News 9, Wausau, ...	138,063	US	English	Newspaper	Media & Infor...
	KVEO-TV CBS-4 [Harlinge...	135,508	US	English	Broadcast Med...	Media & Infor...
	Denton Record-Chronicle, ...	131,943	US	English	Newspaper	Media & Infor...
	WEHT/WTVW [Evansville, I...	131,609	US	English	Broadcast Med...	Media & Infor...
	KTSM [El Paso, TX]	130,030	US	English	Broadcast Med...	Media & Infor...
	WRBL [Columbus, GA]	128,360	US	English	Broadcast Med...	Media & Infor...
	KTEN-TV NBC-10 [Denison...	126,717	US	English	Broadcast Med...	Media & Infor...
	KFDX-TV NBC-3 / KJTL-TV...	117,506	US	English	Broadcast Med...	Media & Infor...
	Quad-City Times, Davenp...	110,841	US	English	Newspaper	Media & Infor...
	KTAB/KRBC [Abilene, TX]	107,994	US	English	Broadcast Med...	Media & Infor...
	WXOW News 19, La Cross...	105,001	US	English	Newspaper	Media & Infor...
	WFXR [Roanoke, VA	103,520	US	English	Broadcast Med...	Media & Infor...
	KSNF/KODE [Joplin, MO]	103,254	US	English	Broadcast Med...	Media & Infor...
	Galveston Daily News, Gal...	101,802	US	English	Newspaper	Media & Infor...
	Galveston Daily News, Gal...	101,802	US	English	Newspaper	Media & Infor...

	Advantage News, Alton, Illi...	99,680	US	English	Newspaper	Media & Infor...
	LakeExpo.com, Lake of the...	98,937	US	English	Newspaper	Media & Infor...
	KXMA/KXMB [Bismark, ND]	97,409	US	English	Broadcast Med...	Media & Infor...
	QuadCities WHBF-TV CBS...	97,156	US	English	Broadcast Med...	Media & Infor...
	WVNS [Beckley, WV]	96,375	US	English	Broadcast Med...	Media & Infor...
	WNCT [Greenville, NC]	94,713	US	English	Broadcast Med...	Media & Infor...
	GazetteXtra, Janesville, Wi...	88,123	US	English	Newspaper	Media & Infor...
	Bismarck Tribune, Bismarc...	85,248	US	English	Newspaper	Media & Infor...
	Norfolk Daily News, Norfol...	83,830	US	English	Newspaper	Media & Infor...
	KWKT-TV FOX-44 / KYLE-T...	81,583	US	English	Broadcast Med...	Media & Infor...
	KREX/KFQX/KGJT [Grand ...	80,112	US	English	Broadcast Med...	Media & Infor...
	WTWO-TV NBC-2/WAWV-...	80,099	US	English	Broadcast Med...	Media & Infor...
	KLST/KSAN [San Angelo, T...	78,304	US	English	Broadcast Med...	Media & Infor...
	WBRE/WYOU [Wilkes-Barr...	77,042	US	English	Broadcast Med...	Media & Infor...
	Sioux City Journal, Sioux C...	75,990	US	English	Newspaper	Media & Infor...
	Southern Minn, Owatonna,...	75,534	US	English	Newspaper	Media & Infor...
	KMID/KPEJ [Odessa, TX]	74,264	US	English	Broadcast Med...	Media & Infor...
	The Courier [Cedar Falls, IA]	72,352	US	English	Newspaper	Media & Infor...
	WJFW News 12, Rhineland...	70,356	US	English	Newspaper	Media & Infor...
	Myhighplains	70,024	US	English	Broadcast Med...	Media & Infor...
	News-Press NOW, St. Jose...	66,954	US	English	Newspaper	Media & Infor...
	KARD/KTVE [West Monroe...	64,461	US	English	Broadcast Med...	Media & Infor...
	Capital Press	63,054	US	English	Newspaper	Media & Infor...
	Capital Press	63,054	US	English	Newspaper	Media & Infor...
	WBGH/WIVT [Binghamton,...	62,785	US	English	Broadcast Med...	Media & Infor...
	KLRT-TV FOX-16 [Little Roc...	61,327	US	English	Broadcast Med...	Media & Infor...
	The Pantagraph, Blooming...	60,788	US	English	Newspaper	Media & Infor...
	KDAF-TV CW-33 [Dallas, TX]	59,752	US	English	Broadcast Med...	Media & Infor...
	WDHN-TV ABC [Webb, AL]	58,679	US	English	Broadcast Med...	Media & Infor...
	The Lawton Constitution, L...	58,458	US	English	Newspaper	Media & Infor...
	Kenosha News, Kenosha, ...	58,418	US	English	Newspaper	Media & Infor...
	WFFF-TV FOX 44 / WVNY-...	58,323	US	English	Broadcast Med...	Media & Infor...
	Globe Gazette, Mason City...	58,240	US	English	Newspaper	Media & Infor...
	Star Local Media, Plano, Te...	58,119	US	English	Newspaper	Media & Infor...

	HNGnews, Horicon, Wisco...	57,856	US	English	Newspaper	Media & Infor...
	The Jewish News, Detroit, ...	56,671	US	English	Newspaper	Media & Infor...
	Valdosta-Daily Times	56,059	US	English	Newspaper	Media & Infor...
	Valdosta-Daily Times	56,059	US	English	Newspaper	Media & Infor...
	Rapid City Journal, Rapid ...	54,077	US	English	Newspaper	Media & Infor...
	Cadillac News, Cadillac, Mi...	52,912	US	English	Newspaper	Media & Infor...
	Cadillac News, Cadillac, Mi...	52,912	US	English	Newspaper	Media & Infor...
	The Daily Leader	52,118	US	English	Newspaper	Media & Infor...
	The Daily Leader	52,118	US	English	Newspaper	Media & Infor...
	Salisbury Post	51,399	US	English	Newspaper	Media & Infor...
	Salisbury Post	51,399	US	English	Newspaper	Media & Infor...
	Voice of Alexandria, Alexa...	48,062	US	English	Newspaper	Media & Infor...
	American Press	46,097	US	English	Newspaper	Media & Infor...
	American Press	46,097	US	English	Newspaper	Media & Infor...
	The Journal Times, Racine,...	43,509	US	English	Newspaper	Media & Infor...
	Starved Rock Media, LaSal...	41,171	US	English	Newspaper	Media & Infor...
	WPHL [Philadelphia, PA]	40,469	US	English	Broadcast Med...	Media & Infor...
	Beloit Daily News, Beloit, ...	38,120	US	English	Newspaper	Media & Infor...
	The Pottstown Mercury, Po...	37,744	US	English	Newspaper	Media & Infor...
	KJAS Radio, Jasper, Texas	37,293	US	English	Newspaper	Media & Infor...
	Shoreline Media Group, Gr...	36,784	US	English	Newspaper	Media & Infor...
	Emporia Gazette, Emporia,...	36,441	US	English	Newspaper	Media & Infor...
	Republican Eagle, Red Win...	34,862	US	English	Newspaper	Media & Infor...
	Temple Daily Telegram, Te...	34,727	US	English	Newspaper	Media & Infor...
	WWTI-TV ABC-50 [Watert...	32,778	US	English	Broadcast Med...	Media & Infor...
	Watertown Daily Times, W...	31,759	US	English	Newspaper	Media & Infor...
	El Paso Inc., El Paso, Texas	31,690	US	English	Newspaper	Media & Infor...
	The State Journal	31,130	US	English	Newspaper	Media & Infor...
	The State Journal	31,130	US	English	Newspaper	Media & Infor...
	Winchester Sun	30,864	US	English	Newspaper	Media & Infor...
	Winchester Sun	30,864	US	English	Newspaper	Media & Infor...
	Winona Daily News, Wino...	30,833	US	English	Newspaper	Media & Infor...
	BocaLista	29,179	Puerto Rico	Spanish	Online News S...	Multicultural...
	The Farmville Herald	29,176	US	English	Newspaper	Media & Infor...

	The Farmville Herald	29,176	US	English	Newspaper	Media & Infor...
	Hancock County Journal-P...	28,890	US	English	Newspaper	Media & Infor...
	Ironton Tribune	28,239	US	English	Newspaper	Media & Infor...
	Ironton Tribune	28,239	US	English	Newspaper	Media & Infor...
	AN 17, Loranger LA	27,171	US	English	Newspaper	Media & Infor...
	NE Iowa News	26,942	US	English	Newspaper	Media & Infor...
	WiscNews [Madison, WI]	26,390	US	English	Newspaper	Media & Infor...
	Beatrice Daily Sun, Beatric...	26,106	US	English	Newspaper	Media & Infor...
	North Texas Daily, Denton,...	25,725	US	English	Newspaper	Media & Infor...
	Hastings Tribune [Hastings...	25,523	US	English	Newspaper	Media & Infor...
	Hastings Tribune [Hastings...	25,523	US	English	Newspaper	Media & Infor...
	KXLG, Watertown, South D...	22,520	US	English	Newspaper	Media & Infor...
	Cherokee Phoenix, Tahleq...	22,303	US	English	Newspaper	Media & Infor...
	Herald & Review, Decatur, ...	22,216	US	English	Newspaper	Media & Infor...
	The Oxford Eagle	22,106	US	English	Newspaper	Media & Infor...
	The Oxford Eagle	22,106	US	English	Newspaper	Media & Infor...
	Union-Recorder	21,859	US	English	Newspaper	Media & Infor...
	Leader-Telegram, Eau Clai...	20,538	US	English	Newspaper	Media & Infor...
	Chippewa Herald, Chippe...	20,504	US	English	Newspaper	Media & Infor...
	Benton Courier, Benton AR	19,535	US	English	Newspaper	Media & Infor...
	The Tryon Daily Bulletin	19,500	US	English	Newspaper	Media & Infor...
	The Tryon Daily Bulletin	19,500	US	English	Newspaper	Media & Infor...
	My Texas Daily, Athens, Te...	19,426	US	English	Newspaper	Media & Infor...
	Carroll Daily Times Herald,...	18,895	US	English	Newspaper	Media & Infor...
	WYTV-TV ABC-33 [Youngs...	18,560	US	English	Broadcast Med...	Media & Infor...
	The O'Colly, Stillwater, Okl...	18,078	US	English	Newspaper	Media & Infor...
	KMZU Radio, Carrollton, M...	18,022	US	English	Newspaper	Media & Infor...
	Lafourche Gazette, Thibod...	17,931	US	English	Newspaper	Media & Infor...
	Portal de Financas	16,359	Brazil	English	Online News S...	Financial
	KJLU 88.9 FM, Jefferson C...	16,153	US	English	Newspaper	Media & Infor...
	Journal Gazette/Times-Co...	16,116	US	English	Newspaper	Media & Infor...
	Daily Jefferson County Uni...	15,920	US	English	Newspaper	Media & Infor...
	SW Iowa News Source	14,995	US	English	Newspaper	Media & Infor...
	True North Radio Network,...	14,725	US	English	Newspaper	Media & Infor...

Missourian	The Missourian	14,684	US	English	Newspaper	Media & Infor...
SEEN	SEEN Magazine, Detroit, M...	14,553	US	English	Newspaper	Media & Infor...
Star-Observer	Hudson Star Observer, Hu...	14,453	US	English	Newspaper	Media & Infor...
Eagle Herald	Eagle Herald Extra, Marine...	14,106	US	English	Newspaper	Media & Infor...
West Newsmagazine	West Newsmagazine, Ellis...	14,025	US	English	Newspaper	Media & Infor...
Elizabethton Star	Elizabethton Star	13,970	US	English	Newspaper	Media & Infor...
Elizabethton Star	Elizabethton Star	13,970	US	English	Newspaper	Media & Infor...
The Greensheet	The Greensheet, Houston,...	13,689	US	English	Newspaper	Media & Infor...
Press & Dakotan	Yankton.net, Yankton, Sout...	13,493	US	English	Newspaper	Media & Infor...
Davie County Enterprise Record	Davie County Enterprise R...	13,445	US	English	Newspaper	Media & Infor...
Davie County Enterprise Record	Davie County Enterprise R...	13,445	US	English	Newspaper	Media & Infor...
CNYhomepage.com	CNYhomepage	13,306	US	English	Broadcast Med...	Media & Infor...
NEWSBUG.info	NEWSBUG.info	13,228	US	English	Newspaper	Media & Infor...
Malvern Daily Record	Malvern Online, Malvern AR	13,108	US	English	Newspaper	Media & Infor...
The Tribune	Bay City Tribune, Bay City, ...	12,865	US	English	Newspaper	Media & Infor...
The Derby Informer	The Derby Informer, Derby...	12,644	US	English	Newspaper	Media & Infor...
Picayune Item	Picayune Item	12,530	US	English	Newspaper	Media & Infor...
Picayune Item	Picayune Item	12,530	US	English	Newspaper	Media & Infor...
mega tv	Mega TV	12,265	US	Spanish	Broadcast Med...	Multicultural...
The Columbus Telegram	Columbus Telegram, Colu...	11,722	US	English	Newspaper	Media & Infor...
The News	Port Arthur News	11,385	US	English	Newspaper	Media & Infor...
The News	Port Arthur News	11,385	US	English	Newspaper	Media & Infor...
Lake Geneva Regional News	Lake Geneva Regional Ne...	10,470	US	English	Newspaper	Media & Infor...
WI Proud	WLAX-TV FOX 28/45 [La C...	10,364	US	English	Broadcast Med...	Media & Infor...
Double T 97.3	Double T 97.3, Lubbock, T...	9,896	US	English	Newspaper	Media & Infor...
The Advocate-Messenger	The Advocate-Messenger	9,716	US	English	Newspaper	Media & Infor...
The Advocate-Messenger	The Advocate-Messenger	9,716	US	English	Newspaper	Media & Infor...
Community Journal	Hays County Community J...	9,694	US	English	Newspaper	Media & Infor...
Americus Times-Recorder	Americus Times-Recorder	9,548	US	English	Newspaper	Media & Infor...
Americus Times-Recorder	Americus Times-Recorder	9,548	US	English	Newspaper	Media & Infor...
The Ouachita Citizen	The Ouachita Citizen [Wes...	9,515	US	English	Newspaper	General
The Post-Searchlight	The Post-Searchlight	8,926	US	English	Newspaper	Media & Infor...
The Post-Searchlight	The Post-Searchlight	8,926	US	English	Newspaper	Media & Infor...
Mid Rivers Newsmagazine	Mid Rivers Newsmagazine...	8,735	US	English	Newspaper	Media & Infor...

	Chicago Star Media, Chica...	8,449	US	English	Newspaper	Media & Infor...
	Stoughton News, Stoughto...	8,420	US	English	Newspaper	Media & Infor...
	Ripon Commonwealth Pre...	8,353	US	English	Newspaper	Media & Infor...
	MessAge Media [Isle, MN]	8,273	US	English	Newspaper	General
	Wisconsin.Golf, Oconomo...	8,220	US	English	Newspaper	Media & Infor...
	L'Observateur	8,217	US	English	Newspaper	Media & Infor...
	L'Observateur	8,217	US	English	Newspaper	Media & Infor...
	Maryville Daily Forum, Mar...	8,159	US	English	Newspaper	Media & Infor...
	Maryville Daily Forum, Mar...	8,159	US	English	Newspaper	Media & Infor...
	Tri-County News, Kiel, Wis...	7,693	US	English	Newspaper	Media & Infor...
	The Daily News	7,643	US	English	Newspaper	Media & Infor...
	The Daily News	7,643	US	English	Newspaper	Media & Infor...
	Insight News, Minneapolis,...	7,304	US	English	Newspaper	Media & Infor...
	East Texas Today [Carthag...	7,162	US	English	Newspaper	Media & Infor...
	The Iosco County News-H...	6,990	US	English	Newspaper	Media & Infor...
	InvestorIdeas	6,989	Global	English	Online News S...	Financial
	The Times of Northwest In...	6,966	US	English	Newspaper	Media & Infor...
	Fremont Tribune, Fremont,...	6,812	US	English	Newspaper	Media & Infor...
	Cannon Falls Beacon, Can...	6,560	US	English	Newspaper	Media & Infor...
	The Vidette, Normal, Illinois	6,539	US	English	Newspaper	Media & Infor...
	NewsBlaze US	6,402	US	English	Online News S...	Media & Infor...
	American Chamber of eCo...	6,370	US	English	Online News S...	Business Serv...
	American Chamber of eCo...	6,370	US	English	Online News S...	Business Serv...
	The Panolian	6,283	US	English	Newspaper	Media & Infor...
	The Panolian	6,283	US	English	Newspaper	Media & Infor...
	Muscatine Journal, Muscat...	6,257	US	English	Newspaper	Media & Infor...
	La Nueva 94 FM	6,253	Puerto Rico	Spanish	Broadcast Med...	Multicultural...
	Orange Leader	6,242	US	English	Newspaper	Media & Infor...
	Poteau Daily News, Potea...	6,169	US	English	Newspaper	Media & Infor...
	WNTZ [Alexandria, LA]	6,071	US	English	Broadcast Med...	Media & Infor...
	Lake Houston Sentinel, Hu...	5,945	US	English	Newspaper	Media & Infor...
	Indianola Record Herald, I...	5,927	US	English	Newspaper	Media & Infor...
	River Valley Now, Russellvi...	5,906	US	English	Newspaper	Media & Infor...
	Verona Press, Verona, Wis...	5,421	US	English	Newspaper	Media & Infor...

	Cowley County News, Win...	5,125	US	English	Newspaper	Media & Infor...
	Antigo Times, Antigo, Wisc...	5,031	US	English	Newspaper	Media & Infor...
	Big Spring Herald, Big Spri...	4,904	US	English	Newspaper	Media & Infor...
	BusinessNorth.com, Dulut...	4,700	US	English	Newspaper	Media & Infor...
	Oregon Observer, Oregon,...	4,402	US	English	Newspaper	Media & Infor...
	Feed-Lot Magazine [Dight...	4,379	US	English	Trade Publica...	Agriculture
	Brady Standard-Herald, Br...	4,375	US	English	Newspaper	Media & Infor...
	Sheboygan Sun, Sheboyg...	4,344	US	English	Newspaper	Media & Infor...
	Marysville Advocate, Mary...	4,155	US	English	Newspaper	Media & Infor...
	The Olathe Reporter, Olath...	4,119	US	English	Newspaper	Media & Infor...
	Jambalaya News, New Orl...	4,068	US	English	Newspaper	Media & Infor...
	St. Claire News-Aegis	3,998	US	English	Newspaper	Media & Infor...
	Middlesboro News	3,995	US	English	Newspaper	Media & Infor...
	Middlesboro News	3,995	US	English	Newspaper	Media & Infor...
	Norfolk Nebraska Radio, N...	3,934	US	English	Newspaper	Media & Infor...
	UNO Gateway	3,911	US	English	Newspaper	Media & Infor...
	Forward Times Publishing ...	3,849	US	English	Newspaper	Media & Infor...
	Claiborne Progress	3,847	US	English	Newspaper	Media & Infor...
	Claiborne Progress	3,847	US	English	Newspaper	Media & Infor...
	The Alestle, Edwardsville, I...	3,792	US	English	Newspaper	Media & Infor...
	Plain Talk, Vermillion, Sout...	3,722	US	English	Newspaper	Media & Infor...
	CW7 Arizona [Phoenix, AZ]	3,660	US	English	Broadcast Med...	Media & Infor...
	Jessamine Journal	3,589	US	English	Newspaper	Media & Infor...
	Jessamine Journal	3,589	US	English	Newspaper	Media & Infor...
	Wisconsin Rapids Tribune, ...	3,493	US	English	Newspaper	Media & Infor...
	Omaha Jewish Press, Oma...	3,454	US	English	Newspaper	Media & Infor...
	The Charlotte Gazette	3,444	US	English	Newspaper	Media & Infor...
	The Charlotte Gazette	3,444	US	English	Newspaper	Media & Infor...
	Antelope County News, N...	3,276	US	English	Newspaper	Media & Infor...
	BUZ Communications [Col...	3,166	US	English	Newspaper	Media & Infor...
	The Interior Journal	3,024	US	English	Newspaper	Media & Infor...
	The Interior Journal	3,024	US	English	Newspaper	Media & Infor...
	The Moore County News-...	3,013	US	English	Newspaper	Media & Infor...
	Waxahachie Sun, Waxahac...	3,012	US	English	Newspaper	Media & Infor...

	The Gleaner, Henderson, ...	2,959	US	English	Newspaper	Media & Infor...
	La Zeta 93.7 FM	2,958	Puerto Rico	Spanish	Broadcast Med...	Multicultural...
	El Zol 106.7 FM	2,957	US	Spanish	Broadcast Med...	Multicultural...
	Marietta Monitor, Marietta, ...	2,951	US	English	Newspaper	Media & Infor...
	The News-Herald [Sterling...	2,843	US	English	Newspaper	Media & Infor...
	Beauregard News	2,713	US	English	Newspaper	Media & Infor...
	Beauregard News	2,713	US	English	Newspaper	Media & Infor...
	The Gleaner, Henderson, ...	2,699	US	English	Newspaper	Media & Infor...
	The Daily Democrat-News,...	2,615	US	English	Newspaper	Media & Infor...
	West Suburban Living Mag...	2,605	US	English	Newspaper	Media & Infor...
	Granite City Daily News [E...	2,604	US	English	Newspaper	Media & Infor...
	Pryor Daily Times, Pryor, O...	2,528	US	English	Newspaper	Media & Infor...
	Albia Newspapers, Albia, I...	2,437	US	English	Newspaper	Media & Infor...
	Hastings Star Gazette, Has...	2,303	US	English	Newspaper	Media & Infor...
	Zeta 92.3 FM	2,295	US	Spanish	Broadcast Med...	Multicultural...
	Magnolia State Live	2,153	US	English	Newspaper	Media & Infor...
	Magnolia State Live	2,153	US	English	Newspaper	Media & Infor...
	Latin Business Today	2,130	US	English	Online News S...	Multicultural...
	Latin Business Today	2,130	US	English	Online News S...	Multicultural...
	Latin Business Today	2,130	US	Spanish	Online News S...	Multicultural...
	Denton County Magazine, ...	2,052	US	English	Newspaper	Media & Infor...
	The Hersey Dispatch, Hers...	2,007	US	English	Newspaper	Media & Infor...
	Kenbridge Victoria Dispatch	1,963	US	English	Newspaper	Media & Infor...
	Kenbridge Victoria Dispatch	1,963	US	English	Newspaper	Media & Infor...
	Maquoketa Sentinel-Press,...	1,949	US	English	Newspaper	Media & Infor...
	Custer County Chief [Brok...	1,887	US	English	Newspaper	Media & Infor...
	The Comanche Chief, Co...	1,878	US	English	Newspaper	Media & Infor...
	Sweetwater Reporter, Swe...	1,799	US	English	Newspaper	Media & Infor...
	The Oneida County News,...	1,693	US	English	Newspaper	Media & Infor...
	Times of San Diego	1,676	US	English	Newspaper	Media & Infor...
	Independent-Journal	1,655	US	English	Newspaper	Media & Infor...
	River Falls Journal, River F...	1,649	US	English	Newspaper	Media & Infor...
	Fitchburg Star, Fitchburg, ...	1,647	US	English	Newspaper	Media & Infor...
	Collinsville Herald, Collins...	1,642	US	English	Newspaper	Media & Infor...

	Creighton...	Creighton, Omaha, Neb...	1,637	US	English	Newspaper	Media & Infor...
	THE TIMES	Pottawattamie County Gaz...	1,629	US	English	Newspaper	Media & Infor...
	CITY NEWS	City News, Oklahoma City,...	1,548	US	English	Newspaper	Media & Infor...
	Dyersville Commercial	Dyersville Commercial, Dy...	1,496	US	English	Newspaper	Media & Infor...
		The Griffon News, Saint Jo...	1,484	US	English	Newspaper	Media & Infor...
	YOUR BIG SKY .COM	KHMT/KSVI [Billings, MT]	1,465	US	English	Broadcast Med...	Media & Infor...
	Kingsville Record	Kingsville Record, Kingsvill...	1,462	US	English	Newspaper	Media & Infor...
	FARM TALK	Farm Talk, Parsons, Kansas	1,439	US	English	Newspaper	Media & Infor...
	Ram Page	ASU Rambler, San Angelo,...	1,415	US	English	Newspaper	Media & Infor...
	The Observer	The Observer, DeWitt, Iowa	1,377	US	English	Newspaper	Media & Infor...
	MINDEN courier	Minden Courier, Minden, N...	1,356	US	English	Newspaper	Media & Infor...
	Courier	The Clemmons Courier	1,351	US	English	Newspaper	Media & Infor...
	Courier	The Clemmons Courier	1,351	US	English	Newspaper	Media & Infor...
	Banner	The Hillsboro Banner, Hills...	1,329	US	English	Newspaper	Media & Infor...
	CMG	Community Media Group [...	1,320	US	English	Newspaper	Media & Infor...
	The Chariton NEWSPAPERS	Chariton Leader, Chariton, ...	1,302	US	English	Newspaper	Media & Infor...
	Herald-Leader	Bellevue Herald-Leader, B...	1,274	US	English	Newspaper	Media & Infor...
	COAST	Coast Monthly [Galveston, ...	1,221	US	English	Newspaper	Media & Infor...
	CHARM	Charm East Texas, Rusk, T...	1,221	US	English	Newspaper	Media & Infor...
	Cascade Pioneer	Camarillo Acorn, Camarillo...	1,216	US	English	Newspaper	Media & Infor...
	LATIN EQUIS	LatinEQUIS	1,184	US	English	Online News S...	Multicultural...
	CORDELE DISPATCH	Cordele Dispatch	1,177	US	English	Newspaper	Media & Infor...
	CORDELE DISPATCH	Cordele Dispatch	1,177	US	English	Newspaper	Media & Infor...
	The Guymon Daily Herald	Guymon Daily Herald, Guy...	1,149	US	English	Newspaper	Media & Infor...
	QUIZAME	Quiza Me	1,145	US	Spanish	Online News S...	General
	NEWSnet Michigan	NEWSNet Michigan	1,103	US	English	Broadcast Med...	Media & Infor...
	COLLECTORS JOURNAL	Collectors Journal [Vinton,...	1,080	US	English	Newspaper	Media & Infor...
	el perico	El Perico	1,069	US	English	Online News S...	Multicultural...
	el perico	El Perico	1,069	US	Spanish	Online News S...	Multicultural...
	Herscher Pilot	The Herscher Pilot, Hersch...	1,024	US	English	Newspaper	Media & Infor...
	Link 2 Lee's Summit	link2leessummit.com	1,022	US	English	Newspaper	Media & Infor...
	CW ChineseWire	ChineseWire	1,004	US	English	Online News S...	Media & Infor...
	The Prentiss Headlight	Prentiss Headlight	999	US	English	Newspaper	Media & Infor...
	The Prentiss Headlight	Prentiss Headlight	999	US	English	Newspaper	Media & Infor...

	Leesville Leader	993	US	English	Newspaper	Media & Infor...
	Leesville Leader	993	US	English	Newspaper	Media & Infor...
	Ashland Town News	986	US	English	Newspaper	Media & Infor...
	City News, Tulsa, Oklahoma	984	US	English	Newspaper	Media & Infor...
	Washington City Paper [W...	922	US	English	Newspaper	General
	Washington City Paper [W...	922	US	English	Newspaper	General
	Holladay Journal	911	US	English	Newspaper	Media & Infor...
	Manchester Press, Manch...	898	US	English	Newspaper	Media & Infor...
	Hispanic PR Wire	894	US	English	Online News S...	Multicultural...
	Corydon Times-Republica...	867	US	English	Newspaper	Media & Infor...
	Jornal Web Digital	866	Brazil	Spanish	Online News S...	General
	Borger News-Herald, Borg...	841	US	English	Newspaper	Media & Infor...
	La Ley 107.9 FM	815	US	Spanish	Broadcast Med...	Multicultural...
	Fayetteville Connect	810	US	English	Newspaper	Media & Infor...
	West Jordan Journal	796	US	English	Newspaper	Media & Infor...
	The Doniphan Herald, Don...	781	US	English	Newspaper	Media & Infor...
	Gaby Natale	780	US	Spanish	Online News S...	Multicultural...
	The Chillicothe Hometown...	775	US	English	Newspaper	Media & Infor...
	La Prensa Hispana	770	US	Spanish	Newspaper	Multicultural...
	South Jordan Journal	766	US	English	Newspaper	Media & Infor...
	RSW Living Magazine [San...	765	US	English	Newspaper	Media & Infor...
	North Texas Television, De...	759	US	English	Newspaper	Media & Infor...
	La Familia de Broward	740	US	Spanish	Magazine	Multicultural...
	NEWSnet Augusta	734	US	English	Broadcast Med...	Media & Infor...
	Cowley College Media, Ar...	698	US	English	Newspaper	Media & Infor...
	Energía, Industria, Comerc...	698	US	Spanish	Online News S...	Multicultural...
	Chester County Press	692	US	English	Newspaper	Media & Infor...
	USA Newshour	675	India	English	Online News S...	General
	Sugar House Journal	675	US	English	Newspaper	Media & Infor...
	The Davis Journal	662	US	English	Newspaper	Media & Infor...
	Midvale Journal	656	US	English	Newspaper	Media & Infor...
	Columbia Business Monthly	650	US	English	Newspaper	Media & Infor...
	Columbia Business Monthly	650	US	English	Newspaper	Media & Infor...
	Sandy Journal	640	US	English	Newspaper	Media & Infor...

	Norfolk & Wrentham News	640	US	English	Newspaper	Media & Infor...
	The News-Gazette, Cham...	616	US	English	Newspaper	Media & Infor...
	Lake Oconee Breeze	611	US	English	Newspaper	Media & Infor...
	Alabama Now	600	US	English	Newspaper	Media & Infor...
	Medway & Millis News	593	US	English	Newspaper	Media & Infor...
	Bayard News Gazette [Bay...	572	US	English	Newspaper	Media & Infor...
	KLXS-FM 95.3	558	US	English	Broadcast Med...	Media & Infor...
	MB News	551	US	English	Newspaper	Media & Infor...
	GoInvest.com	546	Global	English	Online News S...	Financial
	Natick Town News	543	US	English	Newspaper	Media & Infor...
	Hopedale Town News	538	US	English	Newspaper	Media & Infor...
	Ahora News (New Jersey)	538	US	Spanish	Newspaper	Multicultural...
	Herriman Journal	526	US	English	Newspaper	Media & Infor...
	WZZS-FM 106.9 La Númer...	523	US	Spanish	Broadcast Med...	Multicultural...
	Connect Iredell	521	US	English	Newspaper	Media & Infor...
	Toti.com	514	US	English	Newspaper	Media & Infor...
	Bluegrass Live	512	US	English	Newspaper	Media & Infor...
	Bluegrass Live	512	US	English	Newspaper	Media & Infor...
	West Valley City Journal	493	US	English	Newspaper	Media & Infor...
	Franklin Town News	492	US	English	Newspaper	Media & Infor...
	NEWSnet Buffalo	489	US	English	Broadcast Med...	Media & Infor...
	South Salt Lake Journal	477	US	English	Newspaper	Media & Infor...
	City Journals	470	US	English	Newspaper	Media & Infor...
	Cape Coral Living Magazine	458	US	English	Newspaper	Media & Infor...
	Prensa Mexicana	443	US	Spanish	Newspaper	Multicultural...
	SuperLatina TV	442	US	Spanish	Blog	Multicultural...
	Murray Journal	413	US	English	Newspaper	Media & Infor...
	Holliston Town News	413	US	English	Newspaper	Media & Infor...
	KBEW-AM 1560 / KBEW-F...	411	US	English	Broadcast Med...	Media & Infor...
	eNews Park Forest	387	US	English	Newspaper	Media & Infor...
	Cottonwood Heights Jour...	380	US	English	Newspaper	Media & Infor...
	Cottonwood Heights Jour...	380	US	English	Newspaper	Media & Infor...
	The Herald-Star, Steubenvi...	378	US	English	Newspaper	Media & Infor...
	K Pratcher Media	377	US	English	Business/Comp...	General

	Millcreek Journal	374	US	English	Newspaper	Media & Infor...
	Taylorsville Journal	370	US	English	Newspaper	Media & Infor...
	Norwood Town News	364	US	English	Newspaper	Media & Infor...
	Taos News	363	US	English	Newspaper	Media & Infor...
	KZZI-FM 95.9	349	US	English	Broadcast Med...	Media & Infor...
	CBS Lake Charles	348	US	English	Newspaper	Media & Infor...
	Bonita & Estero Magazine	318	US	English	Newspaper	Media & Infor...
	Hattiesburg.com	300	US	English	Online News S...	Media & Infor...
	The Dam 94.3-FM	300	US	English	Broadcast Med...	Media & Infor...
	Forefront Media News	290	US	English	Online News S...	Media & Infor...
	Cheap Fun Things To Do	290	US	English	Online News S...	Travel & Leis...
	Middletown Life Magazine	290	US	English	Print Media	Media & Infor...
	West Virginia Latino News	277	US	Spanish	News & Inform...	Multicultural...
	West Virginia Latino News	277	US	Spanish	News & Inform...	Multicultural...
	North Dakota Latino News	277	US	Spanish	News & Inform...	Multicultural...
	North Dakota Latino News	277	US	Spanish	News & Inform...	Multicultural...
	Michigan Latino News	277	US	Spanish	News & Inform...	Multicultural...
	Michigan Latino News	277	US	Spanish	News & Inform...	Multicultural...
	Iowa Latino News	277	US	Spanish	News & Inform...	Multicultural...
	Iowa Latino News	277	US	Spanish	News & Inform...	Multicultural...
	Indiana Latino News	277	US	Spanish	News & Inform...	Multicultural...
	Indiana Latino News	277	US	Spanish	News & Inform...	Multicultural...
	KYNT-AM 1450	274	US	English	Broadcast Med...	Media & Infor...
	Black Radio Network	265	US	English	News & Inform...	Media & Infor...
	The Pioneer	259	US	English	Newspaper	Media & Infor...
	NEWSnet Austin	257	US	English	Broadcast Med...	Media & Infor...
	NEWSNet Tampa	246	US	English	Broadcast Med...	Media & Infor...
	Missouri Latino News	243	US	Spanish	News & Inform...	Multicultural...
	Missouri Latino News	243	US	Spanish	News & Inform...	Multicultural...
	Montana Latino News	243	US	Spanish	News & Inform...	Multicultural...
	Ismael Cala Foundation	242	US	Spanish	Online News S...	Multicultural...
	NEWSnet Jacksonville	239	US	English	Broadcast Med...	Media & Infor...
	TDS Magazine	230	US	English	Magazine	Tech
	NEWSnet Nashville	229	US	English	Broadcast Med...	Media & Infor...

	NEWSnet Fresno	223	US	English	Broadcast Med...	Media & Infor...
	NEWSNet San Antonio	209	US	English	Broadcast Med...	Media & Infor...
	NEWSNet Boise	207	US	English	Broadcast Med...	Media & Infor...
	NEWSnet Hawaii	205	US	English	Broadcast Med...	Media & Infor...
	NEWSNet Salt Lake City	202	US	English	Broadcast Med...	Media & Infor...
	NEWSNet Odessa	201	US	English	Broadcast Med...	Media & Infor...
	NEWSnet Minneapolis	201	US	English	Broadcast Med...	Media & Infor...
	KQRQ-FM 92.3	201	US	English	Broadcast Med...	Media & Infor...
	Kansas Latino News	198	US	Spanish	News & Inform...	Multicultural...
	Kansas Latino News	198	US	Spanish	News & Inform...	Multicultural...
	Draper Journal	195	US	English	Newspaper	Media & Infor...
	Gulf & Main Magazine	186	US	English	Newspaper	Media & Infor...

Exact placements 501-619 of 619

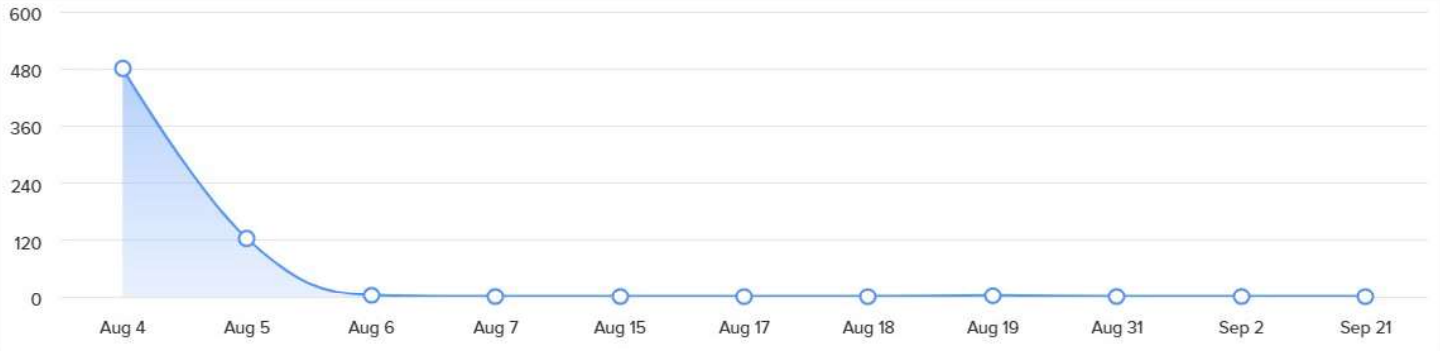
OUTLET	AUDIENCE	LOCATION	LANGUAGE	SOURCE TYPE	INDUSTRY
NEWSnet Detroit	183	US	English	Broadcast Med...	Media & Infor...
NEWSnet Atlanta	181	US	English	Broadcast Med...	Media & Infor...
NEWSNet Sports	180	US	English	Online News S...	Media & Infor...
NEWSNet Los Angeles	180	US	English	Broadcast Med...	Media & Infor...
Mi Ciudad Tampa Bay	174	US	Spanish	Online News S...	Multicultural...
Ohio Latino News	173	US	Spanish	News & Inform...	Multicultural...
Ohio Latino News	173	US	Spanish	News & Inform...	Multicultural...
KDAM-FM 94.3	173	US	English	Broadcast Med...	Media & Infor...
Z106.3 FM	172	US	English	Broadcast Med...	Media & Infor...
KCCR-FM 95.3 [Pierre, SD]	171	US	English	Broadcast Med...	Media & Infor...
NEWSnet Columbia	171	US	English	Broadcast Med...	Media & Infor...
KCCR-AM 1240 [Pierre, SD]	165	US	English	Broadcast Med...	Media & Infor...
NEWSnet Anchorage	163	US	English	Broadcast Med...	Media & Infor...
NEWSnet Monterey	159	US	English	Broadcast Med...	Media & Infor...
Times of the Islands	157	US	English	Newspaper	Media & Infor...
NEWSnet Louisville	153	US	English	Broadcast Med...	Media & Infor...
NEWSNet Waco	150	US	English	Broadcast Med...	Media & Infor...
South Valley Journal	150	US	English	Newspaper	Media & Infor...
NEWSnet Pittsburgh	147	US	English	Broadcast Med...	Media & Infor...

	NEWSNet Norfolk	147	US	English	Broadcast Med...	Media & Infor...
	TheStreet	146	Global	English	Financial New...	Financial
	Univision Minnesota	137	US	Spanish	Broadcast Med...	Multicultural...
	NEWSnet Columbus	130	US	English	Broadcast Med...	Media & Infor...
	Illinois Latino News	127	US	Spanish	News & Inform...	Multicultural...
	Illinois Latino News	127	US	Spanish	News & Inform...	Multicultural...
	Harlan Enterprise	106	US	English	Newspaper	Media & Infor...
	Harlan Enterprise	106	US	English	Newspaper	Media & Infor...
	Tifton Gazette	105	US	English	Newspaper	Media & Infor...
	FACE Magazine	103	US	English	Newspaper	Media & Infor...
	Univision Kansas City	103	US	Spanish	Broadcast Med...	Multicultural...
	Newsradio KOTA [Rapid Ci...	91	US	English	Broadcast Med...	Media & Infor...
	Business Class News	91	US	English	Blog	Media & Infor...
	Boreal Community Media	78	US	English	Newspaper	Media & Infor...
	NEWSnet Las Vegas	74	US	English	Broadcast Med...	Media & Infor...
	SEGUROS, SALUD, PENSI...	72	US	Spanish	Online News S...	Multicultural...
	NEWSnet St. Louis	62	US	English	Broadcast Med...	Media & Infor...
	NEWSNet Sioux Falls	62	US	English	Broadcast Med...	Media & Infor...
	NEWSNet Sacremento	62	US	English	Broadcast Med...	Media & Infor...
	NEWSNet Quincy	62	US	English	Broadcast Med...	Media & Infor...
	NEWSNet Portland	62	US	English	Broadcast Med...	Media & Infor...
	NEWSnet Palm Springs	62	US	English	Broadcast Med...	Media & Infor...
	NEWSNet Orlando	62	US	English	Broadcast Med...	Media & Infor...
	NEWSnet Myrtle Beach	62	US	English	Broadcast Med...	Media & Infor...
	Transporte, Logística & Co...	61	US	Spanish	Newspaper	Multicultural...
	Nebraska Latino News	58	US	Spanish	News & Inform...	Multicultural...
	Nebraska Latino News	58	US	Spanish	News & Inform...	Multicultural...
	ChicaNOL	46	US	Spanish	Blog	Multicultural...
	Fort Bend Herald, Rosenb...	17	US	English	Newspaper	Media & Infor...
	NEWSNet Santa Barbara	15	US	English	Broadcast Med...	Media & Infor...
	KCAU-TV ABC-9 [Sioux Cit...	Not Available	US	English	Broadcast Med...	Media & Infor...
	World Lifestyler	Not Available	US	English	Online News S...	Entertainment
	Your Oregon News	Not Available	US	English	Newspaper	Media & Infor...
	Woodburn Independent	Not Available	US	English	Newspaper	Media & Infor...

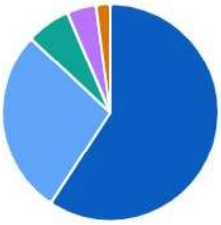
	Wilsonville Spokesman	Not Available	US	English	Newspaper	Media & Infor...
	Wheatland Sun	Not Available	US	English	Newspaper	Media & Infor...
	West Linn Tidings	Not Available	US	English	Newspaper	Media & Infor...
	Wallowa County Chieftain	Not Available	US	English	Newspaper	Media & Infor...
	Valley Times	Not Available	US	English	Newspaper	Media & Infor...
	Thomasville Times-Enterpr...	Not Available	US	English	Newspaper	Media & Infor...
	The Outlook, Gresham, Or...	Not Available	US	English	Newspaper	Media & Infor...
	The Daily Iberian	Not Available	US	English	Newspaper	Media & Infor...
	The Bee News	Not Available	US	English	Newspaper	Media & Infor...
	Territorial Dispatch	Not Available	US	English	Newspaper	Media & Infor...
	Stock Option News	Not Available	Global	English	Online News S...	Financial
	Seaside Signal	Not Available	US	English	Newspaper	Media & Infor...
	Sandy Post	Not Available	US	English	Newspaper	Media & Infor...
	Sacramento Oracle	Not Available	US	English	Newspaper	Media & Infor...
	Rogue Valley Times	Not Available	US	English	Newspaper	Media & Infor...
	Redmond Spokesman	Not Available	US	English	Newspaper	Media & Infor...
	Racine County Eye	Not Available	US	English	Newspaper	Media & Infor...
	Portland Tribune	Not Available	US	English	Newspaper	Media & Infor...
	Oregon City News	Not Available	US	English	Newspaper	Media & Infor...
	Newberg Graphic	Not Available	US	English	Newspaper	Media & Infor...
	Nano Cap Stock Picks	Not Available	Global	English	Online News S...	Financial
	Parish News [New Orleans...	Not Available	US	English	Newspaper	Media & Infor...
	Moultrie Observer	Not Available	US	English	Newspaper	Media & Infor...
	Milwaukie Review	Not Available	US	English	Newspaper	Media & Infor...
	Milford Free Press	Not Available	US	English	Newspaper	Media & Infor...
	MicroCap Stocks	Not Available	Global	English	Online News S...	Financial
	Meridian Star	Not Available	US	English	Newspaper	Media & Infor...
	Mega Cap Stock Picks	Not Available	Global	English	Online News S...	Financial
	Magnificent Sevent Stocks	Not Available	Global	English	Online News S...	Financial
	The Madras Pioneer	Not Available	US	English	Newspaper	Media & Infor...
	Lake Oswego Review	Not Available	US	English	Newspaper	Media & Infor...
	The La Grande Observer	Not Available	US	English	Newspaper	Media & Infor...
	Hillsboro Tribune	Not Available	US	English	Newspaper	Media & Infor...
	Hermiston Herald	Not Available	US	English	Newspaper	Media & Infor...

Pioneer	Herald Pioneer	Not Available	US	English	Newspaper	Media & Infor...
The Gridley Herald	Gridley Herald	Not Available	US	English	Newspaper	Media & Infor...
Corporate Giants	Global Corporate Giants	Not Available	Global	English	Online News S...	Financial
News Times	Forest Grove News-Times	Not Available	US	English	Newspaper	Media & Infor...
Eye on Dunn County	Eye on Dunn County	Not Available	US	English	Newspaper	Media & Infor...
EV Stock Picks	EV Stock Picks	Not Available	Global	English	Online News S...	Financial
News	Estacada News	Not Available	US	English	Newspaper	Media & Infor...
ESG Stock Info	ESG Stock Info	Not Available	Global	English	Online News S...	Financial
The News Courier	The News Courier	Not Available	US	English	Newspaper	Media & Infor...
Energy Stock Info	Energy Stock Info	Not Available	Global	English	Online News S...	Financial
East Oregonian	East Oregonian	Not Available	US	English	Newspaper	Media & Infor...
Dividend Stock News	Dividend Stock News	Not Available	Global	English	Online News S...	Financial
Dalton Daily Citizen	Dalton Daily Citizen	Not Available	US	English	Newspaper	Media & Infor...
the Astorian	The Daily Astorian	Not Available	US	English	Newspaper	Media & Infor...
The Cullman Times	The Cullman Times	Not Available	US	English	Newspaper	Media & Infor...
Spotlight	Columbia County Spotlight	Not Available	US	English	Newspaper	Media & Infor...
Chinook Observer	Chinook Observer	Not Available	US	English	Newspaper	Media & Infor...
Oregonian	Central Oregonian	Not Available	US	English	Newspaper	Media & Infor...
Idaho Enterprise	Idaho Enteprise	Not Available	US	English	Newspaper	Media & Infor...
Blue Mountain Eagle	Blue Mountain Eagle	Not Available	US	English	Newspaper	Media & Infor...
The Bulletin	The Bulletin	Not Available	US	English	Newspaper	Media & Infor...
Times	Beaverton Valley Times	Not Available	US	English	Newspaper	Media & Infor...
Baker City Herald	Baker City Herald	Not Available	US	English	Newspaper	Media & Infor...
augusta business daily	Augusta Business Daily	Not Available	US	English	Newspaper	Media & Infor...
augusta business daily	Augusta Business Daily	Not Available	US	English	Newspaper	Media & Infor...
Auburn Sentinel	The Auburn Sentinel	Not Available	US	English	Newspaper	Media & Infor...
AI Stock Info	AI Stock Info	Not Available	Global	English	Online News S...	Financial
ADR Stock Picks	ADR Stock Picks	Not Available	Global	English	Online News S...	Financial
Minnesota Latino	Minnesota Latino News	Not Available	US	Spanish	News & Inform...	Multicultural...
Minnesota Latino	Minnesota Latino News	Not Available	US	Spanish	News & Inform...	Multicultural...
Wisconsin Latino	Wisconsin Latino News	Not Available	US	Spanish	News & Inform...	Multicultural...
Wisconsin Latino	Wisconsin Latino News	Not Available	US	Spanish	News & Inform...	Multicultural...

Pickup overtime

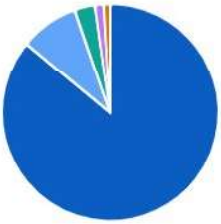


Pickup by source type



Newspaper	367 (59.3%)
Broadcast Media	171 (27.6%)
Online News Sites & Other Influencers	41 (6.6%)
News & Information Service	27 (4.4%)
Other	13 (2.1%)

Pickup by industry



Media & Information	532 (85.9%)
Multicultural & Demographic	54 (8.7%)
Financial	19 (3.1%)
General	8 (1.3%)
Other	6 (1.0%)

Release traffic

Views	Web crawler hits
2,624	13,956

Multimedia traffic

Views	Web crawler hits
4,867	15,880

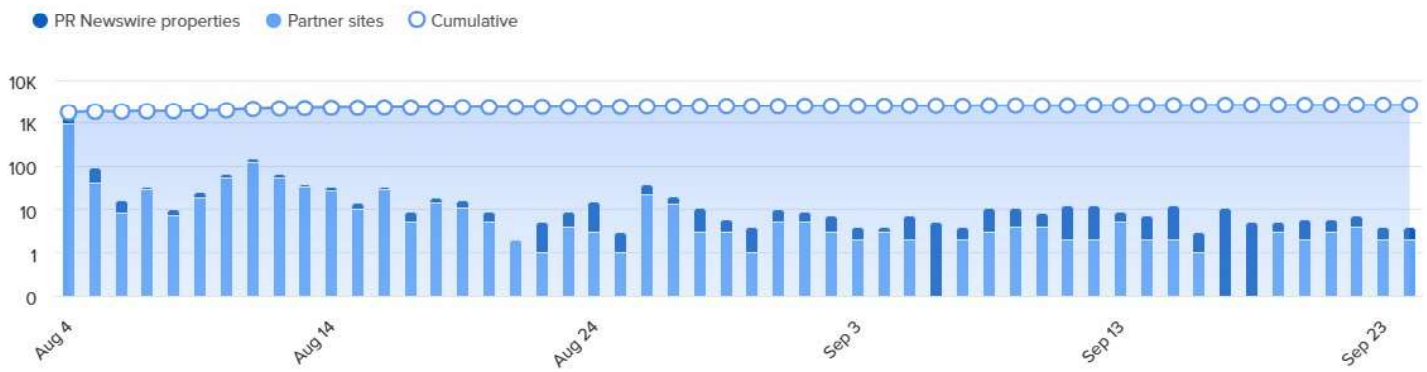
Image views are total number of unique human views of this image, showing its reach.
Web crawler hits are total number of times spiders/bots accessed this release, improving its visibility.

IMAGES	VIEWS	WEB CRAWLER HITS
 View	3,039	8,473
 View	0	0
 View	1,828	7,407
TOTAL	**4,867**	**15,880**

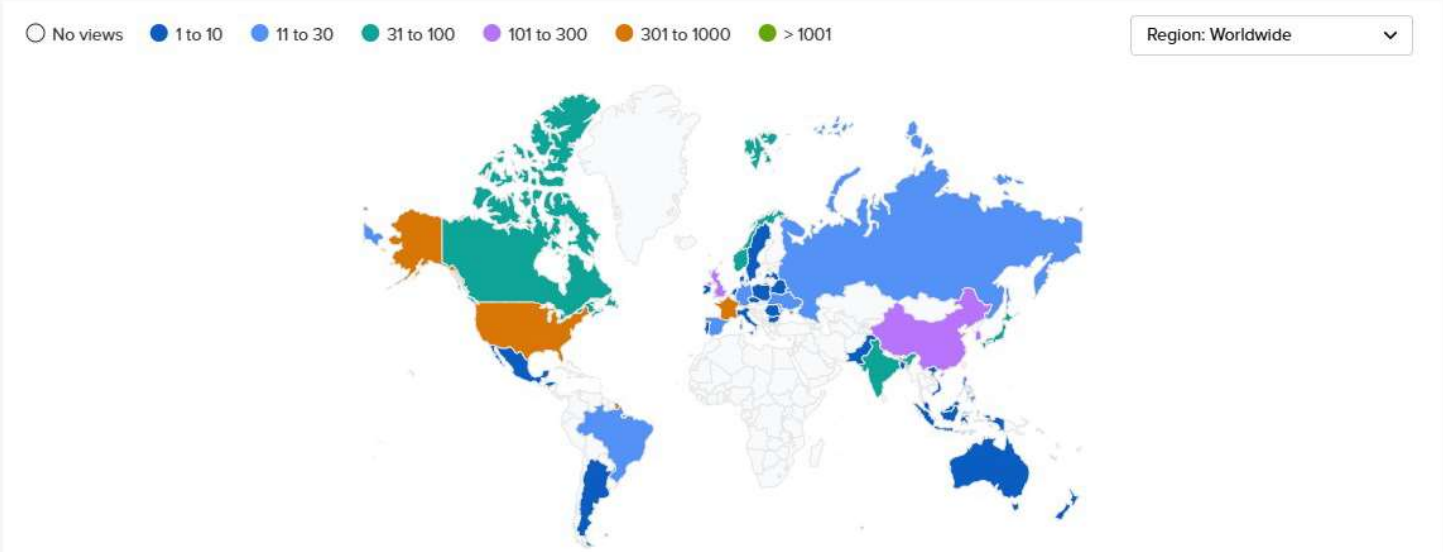
Total views by channel



Total views over time



Total views by location

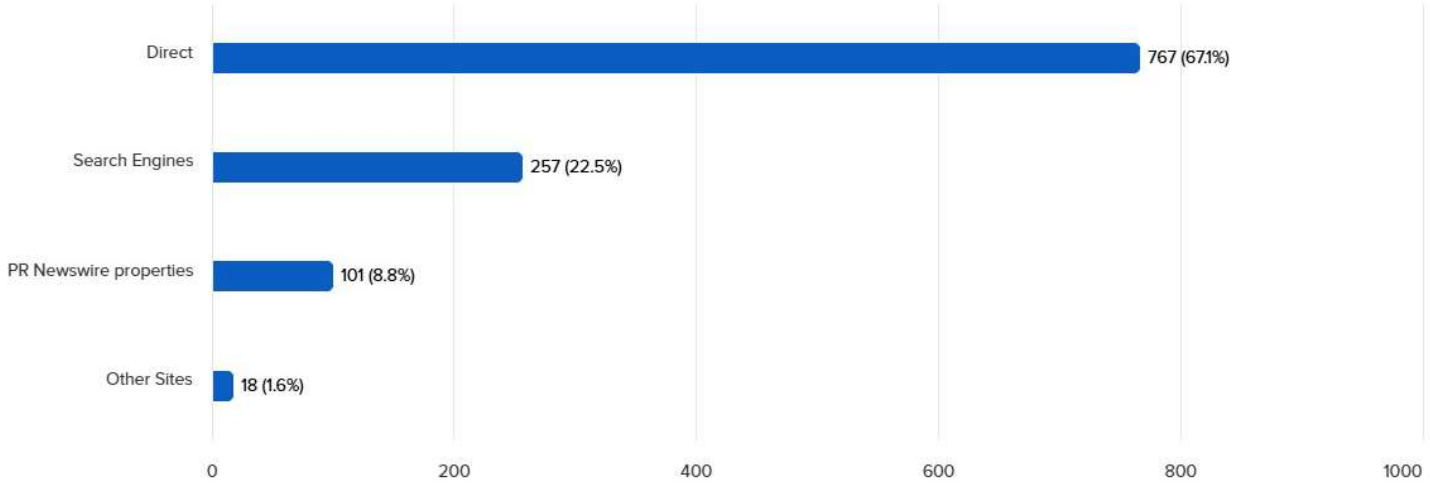


Device views on PR Newswire properties



Traffic sources

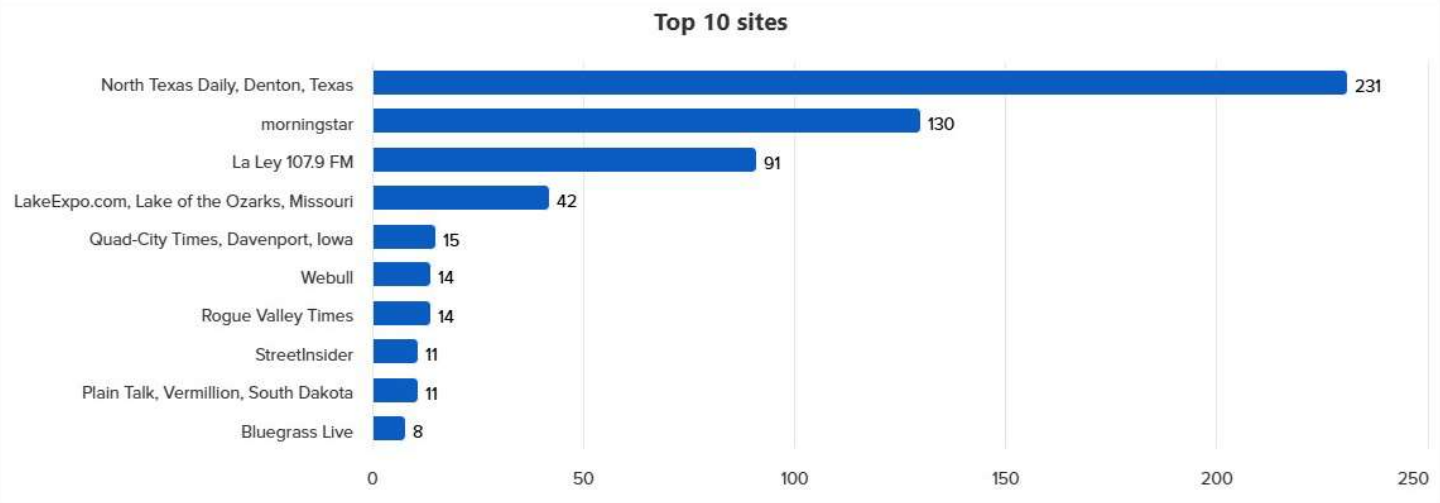
Shows how viewers found your release



Source Type	Source	Instances
Direct		767
⌄ Search Engines (5)		257
Search Engines	google	241
Search Engines	bing	9
Search Engines	duckduckgo	3
Search Engines	yahoo	3
Search Engines	brave	1
⌄ PR Newswire properties (1)		101
PR Newswire properties	prnewswire.com	101
⌄ Other Sites (11)		18
Other Sites	morningstar.com	5
Other Sites	apnews.com	2
Other Sites	app.prnewswire.com	2
Other Sites	ntdaily.com	2
Other Sites	links.streem.com.au	1
Other Sites	alohafind.com	1
Other Sites	plaintalk.net	1
Other Sites	euc-word-edit.officeapps.live.com	1
Other Sites	iris.prnewswire.com	1
Other Sites	duck.ai	1
Other Sites	claimwatch.org	1
Total		**1,143**

Views on partner sites

Shows the number of views on the top 10 partner sites



Audience

Total Potential A...	Journalists	AP News Outlets
102,090,722	272	1,037

Journalist

Note: If you need the full journalist list, please use Copy PNG or Download PNG.

OUTLET	COUNTRY	BY INDUSTRY	MEDIA TYPE	VIEW COUNT
10 BTM	Philippines	Consumer Products, Features, Financial Services, General Business, Public Issues, Technology	Freelance/Writer, Podcaster	3
506 Studios LLC	United States of America	Consumer Products, Energy, General Business, Media, Technology, Travel	Blogger, Freelance/Writer	3
Monsenews	United States of America	Media	Video content Creator	3
london juice company	United Kingdom	Consumer Products	Consumer Periodicals	3
Life a la Latina	United States of America	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Blogger	3
Legal Support World	United States of America	Other	Blogger, Freelance/Writer	3
LE DIPLOMATE MEDIA	France	Media	Content Creator	3
KARE 11	United States of America	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Content Creator, Television	3
indiarentalz.com	India	Consumer Products	Blogger	3
NewsNation	United States of America	Travel	Television	3
Houston Chronicle	United States of America	Features	Newspaper	3
HomePage News	United States of America	Consumer Products, Features	Trade Periodicals	3
heart & soul	United States of America	Entertainment, Healthcare, Travel	Consumer Periodicals, Content Creator, Radio	3
Graceguestbooking	United States of America	Broadcast	Podcaster	3
GLD LLC	United States of America	Travel	Influencer	3
GHEP, Rock and Art Culture magazin...	Canada	Energy, Environment, Features, Healthcare, Media, Public Issues, Technology	Freelance/Writer, Newspaper, Other	3
Gaceta UNAM	Mexico	Environment, Features, Healthcare, Media, Public Issues, Sports, Travel	Content Creator, Newspaper	3
Nawae Pakistan	Pakistan	Public Issues	Content Creator	3
Nexstar / WDAF-TV	United States of America	Broadcast, Consumer Products, Entertainment, Features, Media, Sports, Travel	Blogger, Content Creator, Freelance/Writer, Podcaster, Television	3
		Consumer Products, Energy, Entertainment, Environment		

freelance	United States of America	Financial Services, General Business, Healthcare, Media, Travel	Freelance/Writer	3
Soap Opera Network / ErrolLewis.com	United States of America	Auto, Broadcast, Consumer Products, Entertainment, Features, General Business, Media, Other, Sports, Technology, Travel	Blogger, Content Creator, Freelance/Writer, Newspaper, Other, Television	3
The Vibe Out Media Outlet	United States of America	Technology	Video content Creator	3
The St. Louis Riverfront Times	United States of America	Public Issues	Freelance/Writer, Newspaper	3
The Review Ballerina	United States of America	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Blogger	3
Substack	United States of America	Consumer Products, Other	Blogger, Freelance/Writer	3
Student	India	Heavy Industry	Other	3
STEWAWEL News & Information	United States of America	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Content Creator, Radio, Television, Wire Service	3
speniz	United States of America	Auto	Blogger	3
Scot Scoop	United States of America	Features	Newspaper	3
Next Dimension Story	United Kingdom	Other	Other	3
Salmde	United States of America	Healthcare	Blogger, Freelance/Writer	3
Right Symbol LLC	United States of America	Sports, Technology, Travel	Content Creator	3
retailmedialQ	United States of America	Consumer Products, Healthcare	Trade Periodicals	3
Prophotoshopexpert	United States of America	Other	Freelance/Writer	3
Political Markup	United States of America	Broadcast, Entertainment, Features, Financial Services, General Business, Media, Public Issues	Blogger, Content Creator, Freelance/Writer, Influencer, Video content Creator	3
PixelBloom	Brazil	Healthcare	Radio	3
Okinawa Marine	Japan	Broadcast, Environment, Features, Financial Services, Media, Public Issues, Technology, Transport, Travel	Content Creator, Freelance/Writer, Newspaper, Wire Service	3
Freelancer	United States of America	Entertainment, Features, Healthcare	Freelance/Writer, Newspaper	3
Young Voices	United States of America	Consumer Products, Healthcare, Public Issues	Newspaper	3
Cutter Consortium, Data Analytics &...	United States of America	Financial Services, Healthcare, Technology	Blogger, Content Creator, Freelance/Writer, Trade Periodicals	3
Cosmetics Business	United Kingdom	Consumer Products, General Business, Healthcare, Other	Trade Periodicals	3
CBC	Canada	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Radio	3
Caudex Medical Communications	United States of America	Healthcare	Other	3
Brand Labs Group	United States of America	Auto, Consumer Products, Energy, Entertainment, Environment, Features	Consumer Periodicals	3
Cision (PR Newswire)	United States of America	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Blogger, Consumer Periodicals, Content Creator, Freelance/Writer, Newspaper, Other, Radio, Television, Trade Periodicals, Wire Service	3
Cert Center Canada	Canada	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Blogger, Consumer Periodicals, Content Creator, Freelance/Writer, Influencer, Newspaper, Other, Podcaster, Radio, Television, Trade Periodicals, Video content Creator, Wire Service	3
AtmosEsp	United States of America	Entertainment, Media	Other	3
Delion	Canada	Environment, Financial Services, General Business, Other, Technology	Blogger, Newspaper	3
Akyab	Canada	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Blogger	3
CHANTELLEW	Monaco	Financial Services, General Business, Public Issues	Blogger	3
AisMarketCap.com	United States of America	Financial Services	Other	3
African American Leadership Network	United States of America	Technology	Other	3
Cognizant	India	Auto, Broadcast, General Business, Technology	Blogger, Freelance/Writer	3
CNN	United States of America	Consumer Products, Entertainment, Features, Healthcare, Public Issues, Sports, Travel	Television	3

Economic Review	Pakistan	Auto, Energy, Features, Financial Services, Media, Public Issues, Sports	Freelance/Writer, Newspaper, Trade Periodicals	3
cision	United States of America	Auto	Blogger	3
ES Media	United States of America	Media	Influencer	3
Filgizmo	Philippines	Auto, Consumer Products, Energy, Financial Services, Heavy Industry, Technology, Transport	Blogger	3
Crain Communications	United States of America	Consumer Products, Financial Services, General Business, Healthcare, Media, Sports, Technology, Transport, Travel	Newspaper	3
Chemical Processing	United States of America	Energy, Environment, General Business, Heavy Industry, Technology	Trade Periodicals	2
PremierPhotoInt'l	United States of America	Consumer Products, Entertainment, Features, Media, Sports, Travel	Blogger, Freelance/Writer	2
Parade Media	United States of America	Consumer Products	Freelance/Writer	2
Owlmedia	United Kingdom	Environment, Healthcare, Heavy Industry, Technology	Freelance/Writer, Trade Periodicals	2
Celebrate Socialize Explore	United States of America	Consumer Products, Entertainment, Features, Other, Technology, Travel	Blogger, Content Creator, Freelance/Writer	2
Florida Realtors	United States of America	Environment, Features, Financial Services, Other, Public Issues, Technology	Trade Periodicals	2
Rodman Media Corp.	United States of America	Consumer Products, Media	Content Creator, Trade Periodicals	2
Southwestern Journal	United States of America	Media, Other	Newspaper	2
Bagable Media	United States of America	Consumer Products, Entertainment, General Business, Travel	Blogger, Content Creator, Freelance/Writer	2
Asia Press Centre	Singapore	Travel	Newspaper	2
The Community Press	Canada	Auto, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Public Issues, Sports, Technology, Transport, Travel	Content Creator, Newspaper	2
Accion Labs	India	Auto, Consumer Products, Entertainment, Environment, Healthcare, Media, Technology	Blogger, Consumer Periodicals, Content Creator, Influencer, Newspaper, Radio	2
Thirteen Stories Publishing	United States of America	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Content Creator, Freelance/Writer	2
TODAY.com	United States of America	Consumer Products	Content Creator	2
TravelWithTheRussells	United States of America	Travel	Content Creator	2
Viable.Earth	Vietnam	Auto, Consumer Products, Energy, Environment	Content Creator	2
Woman's Day	United States of America	Features, Healthcare, Other	Consumer Periodicals, Content Creator, Freelance/Writer, Newspaper, Trade Periodicals	2
Northumberland Queeries	Canada	Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Media, Public Issues, Sports, Technology	Blogger, Newspaper	2
NewsRx	United States of America	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Content Creator	2
Journalist	United States of America	Travel	Video content Creator	2
Kingsport Times-New	United States of America	Other	Newspaper	2
Freelancer	United States of America	Other	Trade Periodicals	2
EL PAIS	United States of America	Consumer Products, Energy, Entertainment, Financial Services, General Business, Media, Technology, Transport, Travel	Newspaper	2
Dotdash Meredith	United States of America	Consumer Products, Entertainment, Features, Healthcare, Media, Other, Technology, Travel	Blogger, Content Creator, Freelance/Writer, Other	2
hispanic pr blog	United States of America	Media	Freelance/Writer	2
Digital Transactions	United States of America	Technology	Trade Periodicals	2
Design World	United States of America	Technology	Freelance/Writer, Trade Periodicals	2
IKEA Hackers	United States of America	Other	Blogger	2
Jalisa Harris	United States of America	Entertainment, Other, Travel	Blogger, Freelance/Writer	2
Daily evening Newspaper	Pakistan	Public Issues	Newspaper	2
Jyquan Stewart	United States of America	Broadcast, Media, Public Issues	Other	2
Flying Cork Media, LLC	United States of America	Auto, Consumer Products, Energy, Features, General Business, Healthcare, Heavy Industry, Technology, Travel	Content Creator, Newspaper, Podcaster, Television	2
		Broadcast, Consumer Products, Entertainment, Environment,		

KDVR	United States of America	Features, General Business, Healthcare, Heavy Industry, Media, Public Issues, Technology, Transport, Travel	Television	2
MoneyGene.Com	India	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Blogger, Other	2
NBCUniversal	United States of America	Consumer Products, Media	Content Creator, Television	2
LBM Journal	United States of America	Consumer Products, Other	Trade Periodicals	2
NewsRise	Malaysia	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Freelance/Writer, Newspaper, Radio, Wire Service	2
Lifecarenews	India	Entertainment, Healthcare, Media, Sports, Technology, Travel	Blogger, Content Creator, Newspaper	2
Lola Digital Media	United States of America	Auto, Consumer Products, Energy, Environment, Features, Media, Sports, Technology, Travel	Freelance/Writer	2
CNBC-TV18	India	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transport, Travel	Content Creator	2
ConsumerAffairs	United States of America	Consumer Products	Content Creator	2

Associated Press Outlet

OUTLET NAME	LOCATION	STATE	CITY	SOURCE TYPE	AUDIENCE
C-SPAN	US	DC	Washington	Television	86,200,000 Subscribers
Scribd, Inc.	US	CA	San Francisco	Aggregator	43,531,670 Visitors per Month
FoxNews.com	US	NY	New York	Online	32,516,438 Visitors per Month
CBS News Radio	US	NY	New York	Radio	30,000,000 Broadcast Audience
New York Times Digital	US	NY	New York	Newspaper	29,886,442 Visitors per Month
Apple Inc.	US	CA	Cupertino	Organization/Company	29,709,459 Visitors per Month
CNBC.com	US	NJ	Englewood Cliffs	Online	26,089,260 Visitors per Month
CBSnews.com	US	NY	New York	Online	26,080,671 Visitors per Month
abcnews.com	US	NY	New York	Online	24,167,779 Visitors per Month
U.S. News & World Report	US	DC	Washington	Magazine	23,945,529 Visitors per Month

Engagement

Click-throughs

2,441

Shares

3

Click-throughs: 2441

Number of times your release sent visitors to the pages you linked to.

Click-throughs

URL	VIEWS

https://www.poolsettlementbw.com/?utm_source=PRN&utm_medium=Payment&utm_campaign=Bestway	789
https://www.poolsettlementbw.com/?utm_source=PRN&utm_medium=MoreInfo&utm_campaign=Bestway	754
https://www.poolsettlementbw.com/?utm_source=PRN&utm_medium=Options&utm_campaign=Bestway	740
https://www.poolsettlementbw.com/?utm_source=PRN_Spa&utm_medium=MoreInfo&utm_campaign=Bestway	54
https://www.poolsettlementbw.com/?utm_source=PRN_Spa&utm_medium=Options&utm_campaign=Bestway	53
https://www.poolsettlementbw.com/?utm_source=PRN_Spa&utm_medium=Payment&utm_campaign=Bestway	51

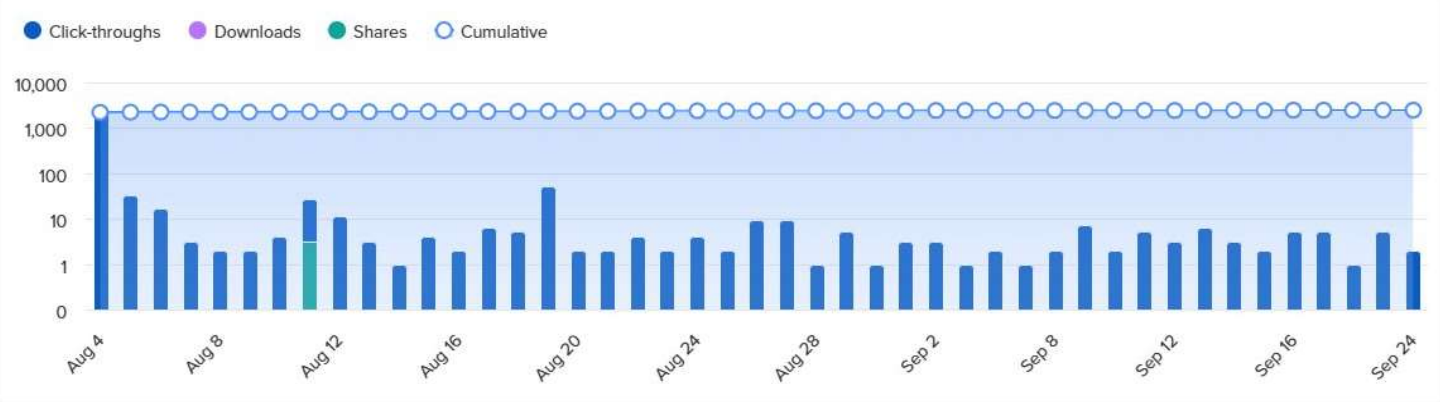
Shares: 3

Break down of the types of sharing your release generated

Shares

TYPE OF SHARES	SHARES
Other	1
LinkedIn	1
Facebook	1

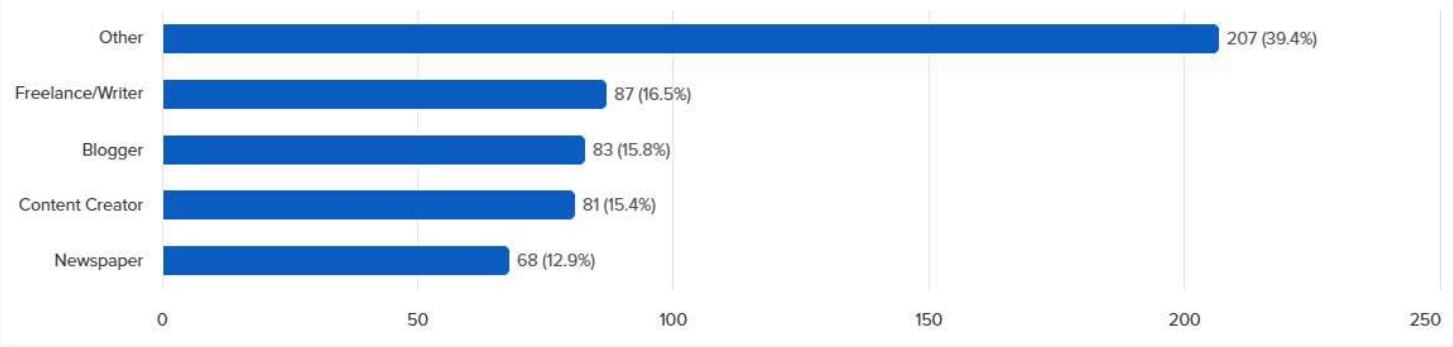
Engagement over time



Top journalists

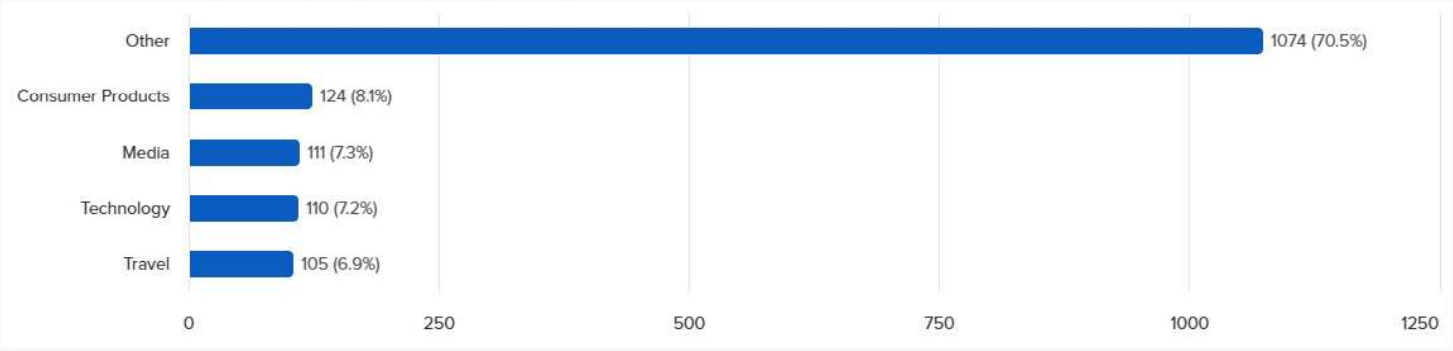
Type

Types of journalists who access your release the most, sourced from PR Newswire for Journalists



Industry

Industries that journalists access your release the most, sourced from PR Newswire for Journalists



Location

Locations where journalists access your release the most, sourced from PR Newswire for Journalists

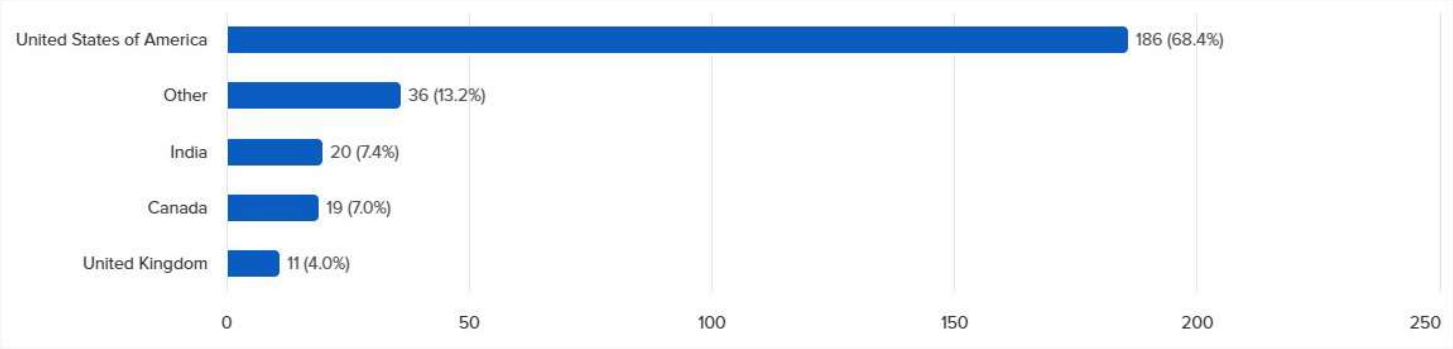


Exhibit D: Reminder Email Notice

Settlement Claim ID:

Reminder Notice
Claim Submission Deadline is October 30, 2026

If you purchased a 48-inch or taller Bestway above-ground pool with straps running to the outside of the vertical legs since 2008, you may be entitled to benefits from a class action Settlement.

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

This notice is only a summary of the key Settlement terms. The Settlement Agreement and Long Form Notice are available on the Settlement Website at www.PoolSettlementBW.com or by calling 1-855-789-5948.

A proposed settlement has been reached in a class action lawsuit against Bestway (USA) Inc. ("Bestway USA"), Bestway Inflatables & Material Corp. ("Bestway Inflatables"), and Bestway (Hong Kong) International Ltd ("Bestway Hong Kong") (collectively "Bestway" or "Defendants") relating to an alleged safety defect that creates a potential drowning hazard. The case is titled In re: Bestway Above-Ground Pools Litigation, No. 1:25-cv-09570 (N.D. Ill.). The settlement is not an admission of liability and does not release claims for personal injury or property damage. Additionally, nothing in this agreement modifies, limits, or extinguishes the July 21, 2025 Recall related to the at-issue Pools, which remains in effect independent of this Settlement, and which is neither endorsed by nor incorporated into this Settlement.

Who is included in the Settlement?

You are part of the Settlement Class if you purchased for personal use and not for resale from a store or other commercial retailer—not second-hand, a Bestway-branded pool 48 inches in height or taller (including Power Steel and Steel Pro models) with compression straps located outside of the support poles, sold from 2008 through May 4, 2026.

What are the Settlement Benefits?

The Settlement makes available to Settlement Class Members $15,000,000, which is structured to cover and include payments and distributions to eligible Settlement Class Members, Notice and Administrative

Costs, Attorneys' Fees and Expenses (not to exceed one-third of the Settlement Amount), and Service Awards of $2,500 to each of the named Plaintiffs.

How do I receive a payment from the Settlement?

Settlement Class Members must submit a Claim Form online at www.PoolSettlementBW.com or by mail postmarked by October 30, 2026 to the Settlement Administrator at Bestway Settlement Administrator, P.O. Box 1869, Baton Rouge, LA 70821. Claim forms are also available by calling 1-855-789-5948 or by emailing info@poolsettlementBW.com. Class Members who submit a Valid Claim will have several electronic payment options to choose from, or you can elect to receive a check.

What are my Options?

Submit a Claim Form: If you submit a Claim Form, you may receive a monetary award but will not be able to sue or continue to sue the Defendants about the claims resolved by this Settlement.

Exclude Yourself: If you do not want to be legally bound by the Settlement, you must exclude yourself; you will not receive any monetary Settlement benefits, but you will keep your right to sue the Defendants in a separate lawsuit about the claims resolved by this Settlement.

Object: If you do not exclude yourself, you can object to the Settlement. Any Settlement Class Member who does not submit a timely and valid objection gives up the right to object or to speak at the Final Approval Hearing. You will be bound by the Settlement Agreement and will no longer be able to make any objection to the Settlement.

Complete details on how to exclude yourself or object to the Settlement are available at www.PoolSettlementBW.com. The deadline to exclude yourself or object is **October 30, 2026.**

Do Nothing: If you do nothing, you will remain in the class, you will not be eligible for monetary benefits, and you will be bound by the decision of the Court and give up your rights to sue Defendants for the claims resolved by this Settlement.

Has the Court approved the Settlement?

No. The Court will hold a Final Approval Hearing on **November 20, 2026, at 10:00 a.m., CDT**, before the

Honorable Lindsey C. Jenkins of the United States District Court for the Northern District of Illinois, 219 South Dearborn Street, Courtroom 2119, Chicago, IL 60604, to determine whether the Settlement is fair, reasonable, and adequate, and to consider attorney Fee Awards and Service Awards ($2,500 each) to the Settlement Class Representatives. Class Counsel's Motion for Attorney Fee Awards will be available on the Settlement Website after it is filed with the Court. If there are objections, the Court will consider them.

You or your own lawyer, if you have one, may ask to appear and speak at the hearing at your own cost, but it is not required. You do not need to attend the hearing to receive benefits.

How do I get more Information?

This notice is only a summary. For additional information, please visit www.PoolSettlementBW.com or call toll-free 1-855-789-5948. You may also write to the Settlement Administrator at Bestway Settlement Administrator, P.O. Box 1869, Baton Rouge, LA 70821.

Bestway Settlement Administrator
PO Box 1869, Baton Rouge, LA 70821
Unsubscribe - Unsubscribe Preferences

Exhibit E: Claims Stimulation Internet Publication Notice

Home Improvement

Complete your quote now

Project home improved USA TODAY NETWORK
Your essential destination to power up every home improvement project.



STORY FROM ADDRESSUSA



How lower interest rates could boost your homebuying power

Lower mortgage rates can mean the difference between buying a good house and a great one.



Bissell's best vacuum deals for fall are up to $100 off now

Bissell's fall deals include discounts of up to $100 on vacuums and carpet cleaners, plus extra savings up to 15% off on qualifying orders.

SHOPPING

STORY OF THE DAY

Give your porch goose a spooky season makeover with these fall outfits

Shop the latest Giddy the Goose fall and Halloween outfits, including a glow-in-the-dark skeleton, pumpkin poncho, scarecrow and turkey-themed look.



Trisha Easto
USA TODAY





Advertisement



If you purchased a 48-inch or taller Bestway above-ground pool with straps running to the outside of the vertical legs since 2008, you may be entitled to benefits from a class action Settlement.
LEARN MORE
CLAIMS DEADLINE: OCTOBER 30, 2026

Top Stories

Why one of my favorite early Prime deals is a laser measuring tape

Amazon's Prime Big Deal Days sale begins October 6, but this deal is already worth shopping. Save 31% on the Fanttik A10 Apex 3-in-1 Digital Laser Tape Measure today.

SHOPPING

Best home warranties for Florida residents, top coverage for humid climates

Florida's climate stresses home systems. Find the best home warranty for 2026 to cover costly repairs and protect your investment.

MONEY

How this under-$130 kitchen gadget helps cut food waste fast

Looking for an easier way to meal prep? The under-$130 Fresko AutoMax V8 automates vacuum sealing to help preserve food longer.

SHOPPING

Hurricane windows explained





Business

About Generation Z: Oh, How the Tables Have Turned

As we look for individuals to carry on the legacy of those retiring soon, the priorities of the new generation suggest that more great prospective successors are just around the corner.

3 MIN READ



If you purchased a 48-inch or taller Bestway above-ground pool with straps running to the outside of the vertical legs since 2008, you may be entitled to benefits from a class action Settlement.

LEARN MORE

CLAIMS DEADLINE: OCTOBER 30, 2026



Companies

Automatic Pool Covers Bolsters Sales Team



Business

Payan Sells to California Consolidator

TRENDING

Business

About Generation Z: Oh, How the Tables Have Turned

3 MIN READ

MLB | Sep 27 | Canceled BAL NYY | Final NYM WSH 6 | Final PHI 7 | Final CHC BOS 2 | Final HC AT | Full Scoreboard »

ESPN

MLB | Home | Scores | Playoff Bracket | Schedule | Standings | Stats | Teams | Odds | Where To Watch | More



If you purchased a 48-inch or taller Bestway above-ground pool with straps running to the outside of the vertical legs since 2008, you may be entitled to benefits from a class action Settlement.

LEARN MORE

CLAIMS DEADLINE: OCTOBER 30, 2026



The only MLB playoff preview you need: World Series odds, likely MVPs and how far all 12 teams will go

Have Fall Classic or bust hopes this postseason? Here's why your team could be playing late into October ... or get sent home early.

16h • ESPN



2026 MLB playoffs: Schedule, postseason bracket, standings

We have your one-stop shop for everything you need to keep up with all the action this October.

17h • ESPN

- Who clinched, plus who they'll face next
- Wild Card Round odds: Favorites for every series

TOP HEADLINES

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AI Overview

Bestway has reached a **$15 million class action settlement** regarding safety and drowning hazard allegations tied to certain above-ground pools. Top Class Actions +1

Settlement Overview: Above-Ground Pools

- **The Issue:** The lawsuit claims Bestway sold above-ground pools (2008–2024) that were 48 inches or taller with outside compression straps, creating a climbing and drowning risk. www.poolsettlementbw.c...
- **Who is Eligible:** Consumers in the U.S. who bought a qualifying Bestway-branded, Power Steel, Steel Pro, or Coleman Power Steel pool (48+ inches tall with outside compression straps) between 2008 and 2024.

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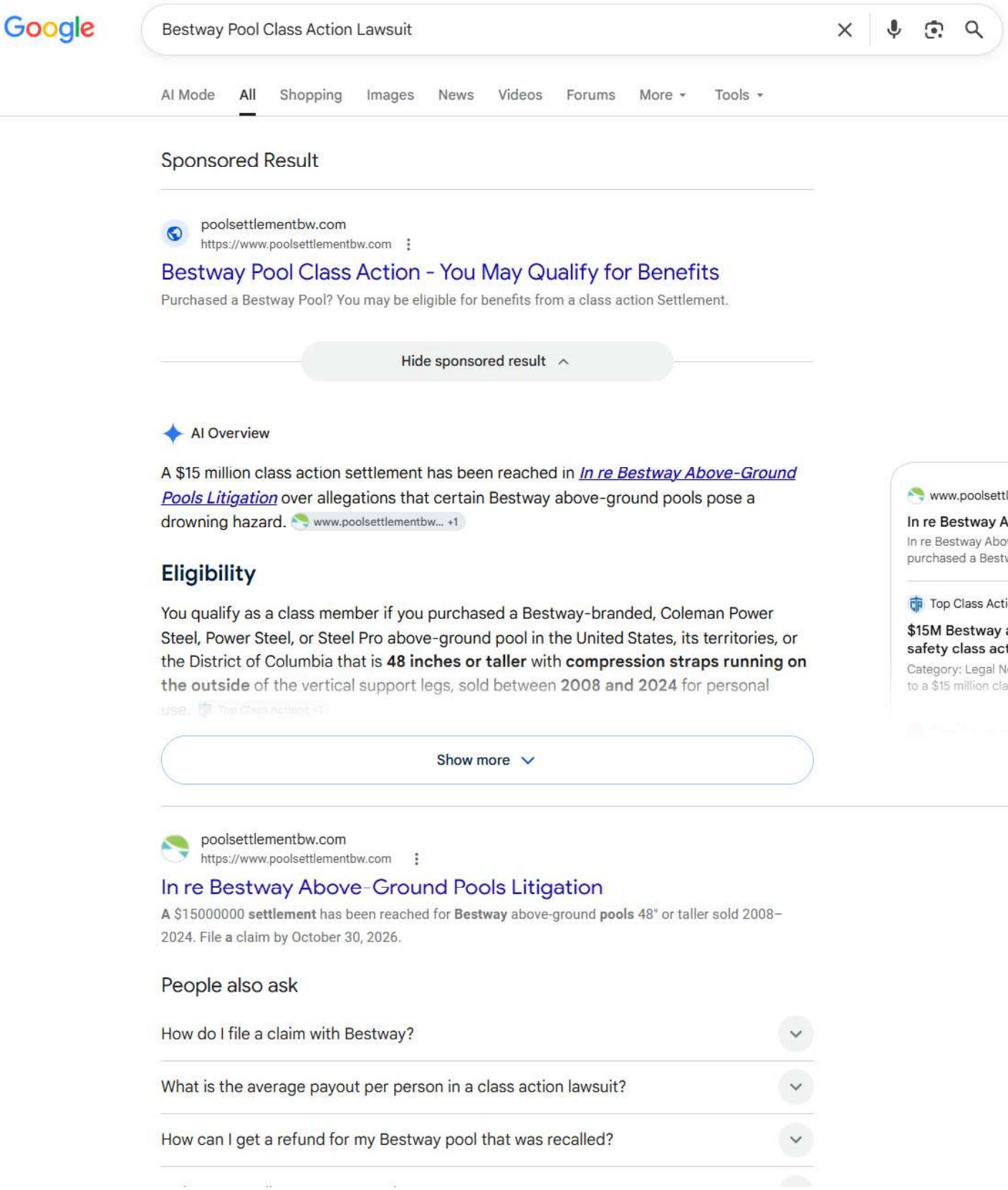
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Eligibility
You qualify as a class member if you purchased a Bestway-branded, Coleman Power Steel, Power Steel, or Steel Pro above-ground pool in the United States, its territories, or the District of Columbia that is 48 inches or taller with compression straps running on the outside of the vertical support legs, sold between 2008 and 2024 for personal
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A $15000000 settlement has been reached for Bestway above-ground pools 48" or taller sold 2008–2024. File a claim by October 30, 2026.
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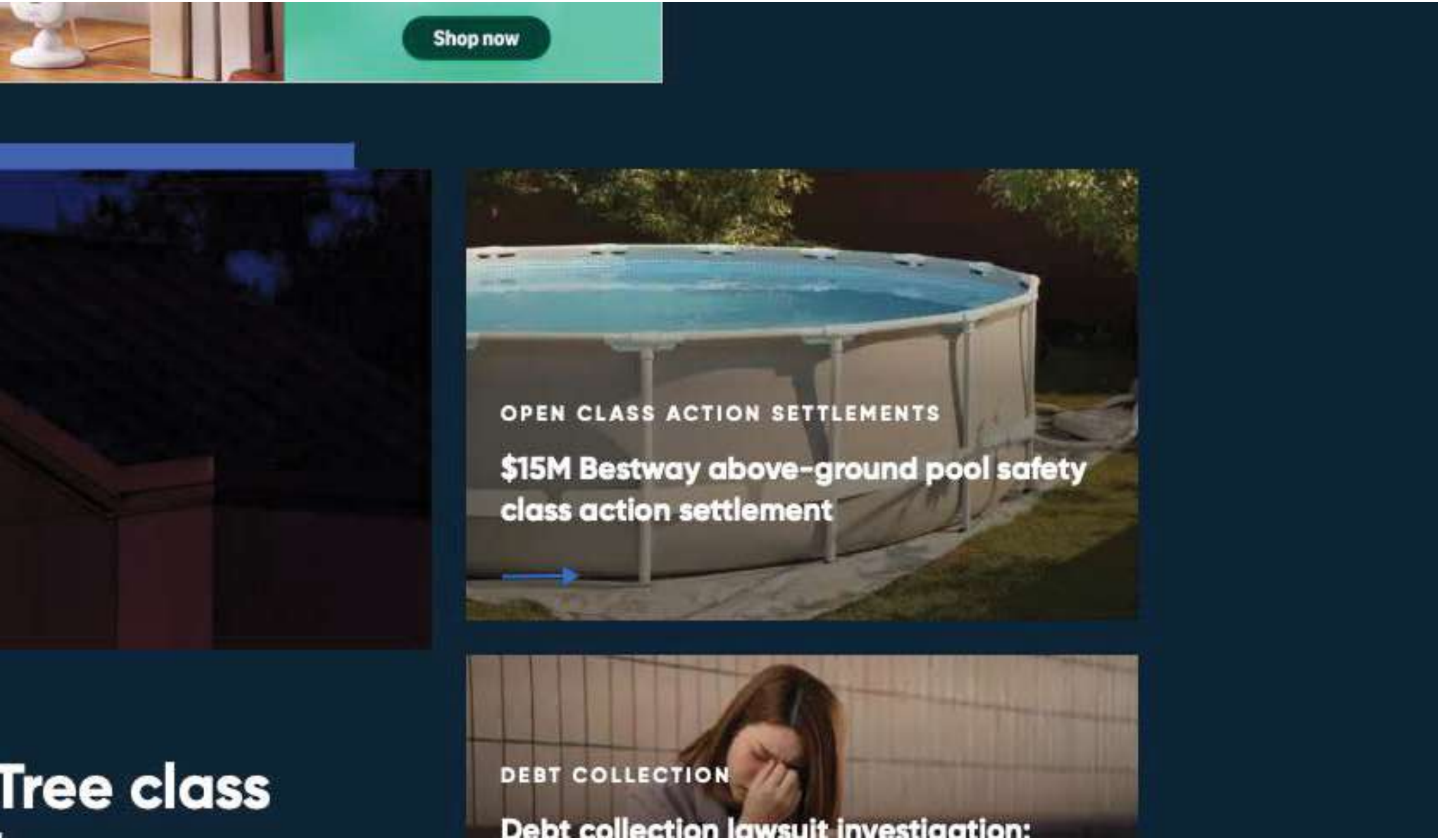
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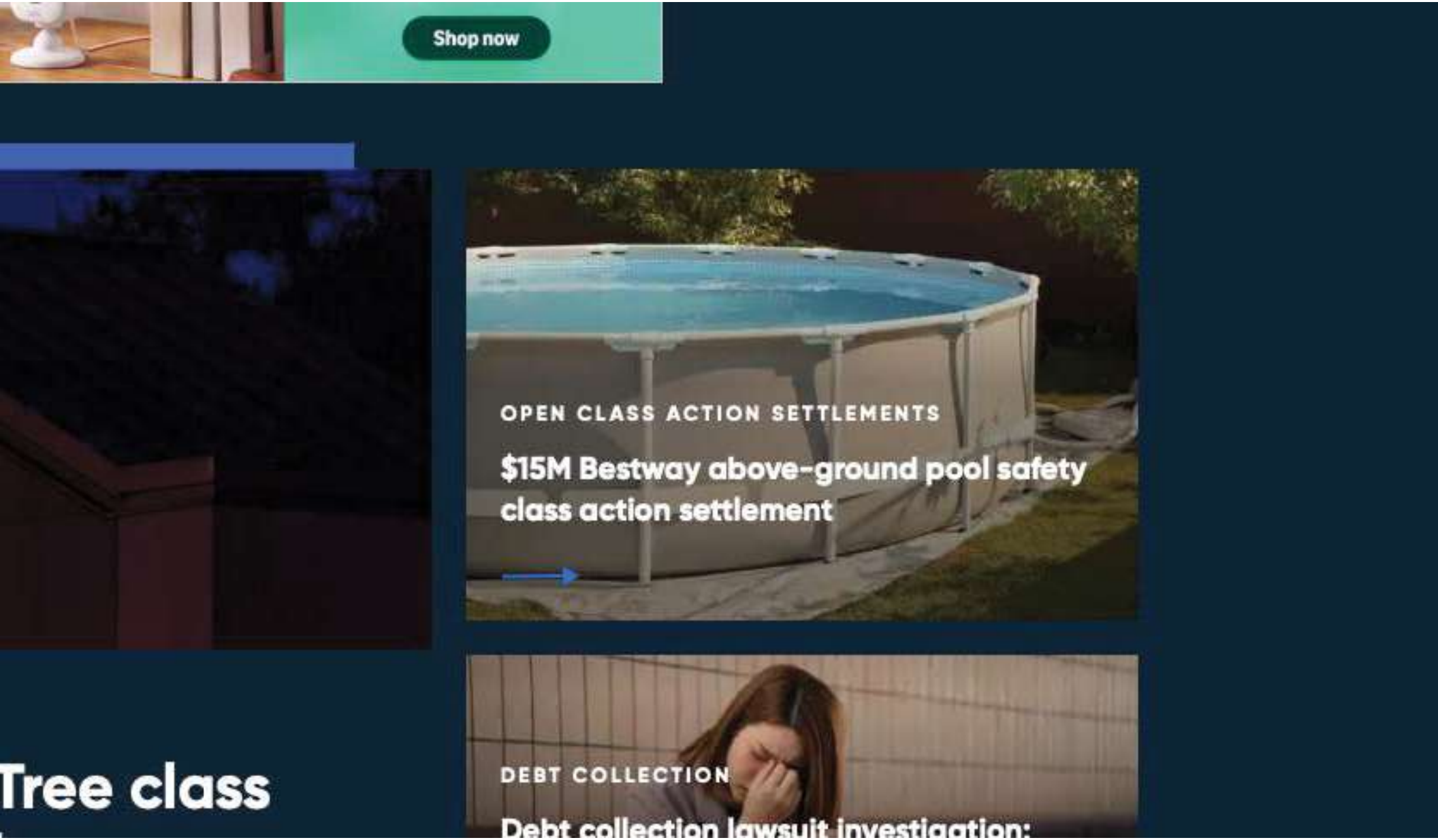
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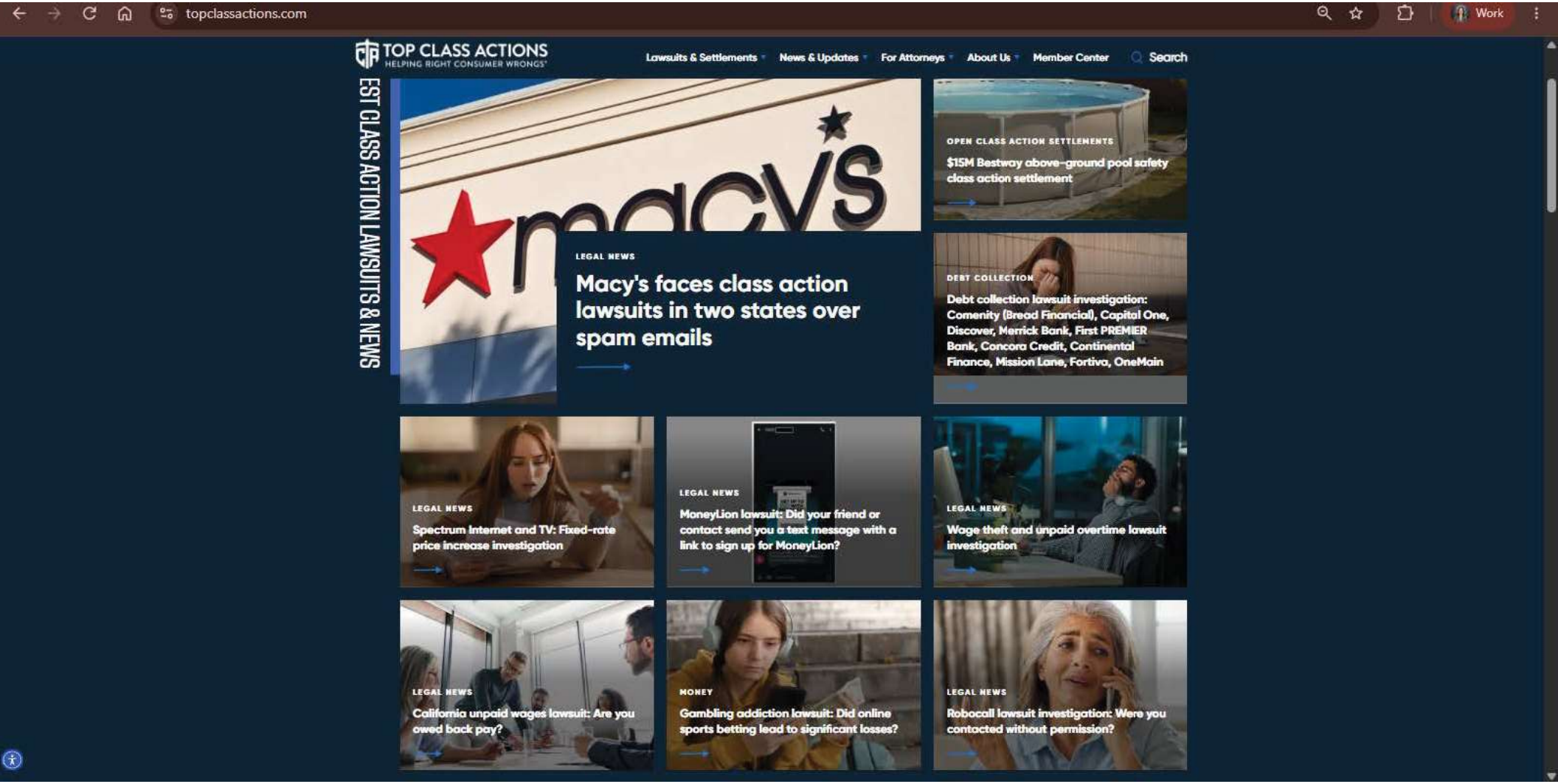
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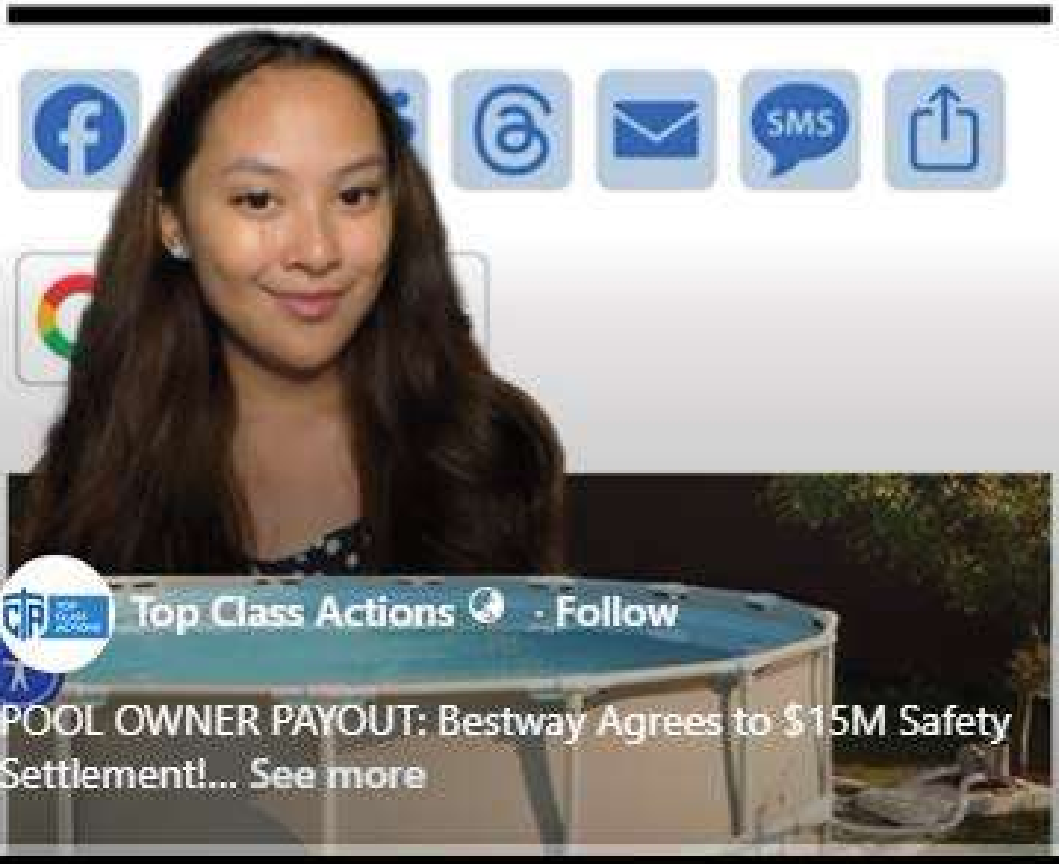

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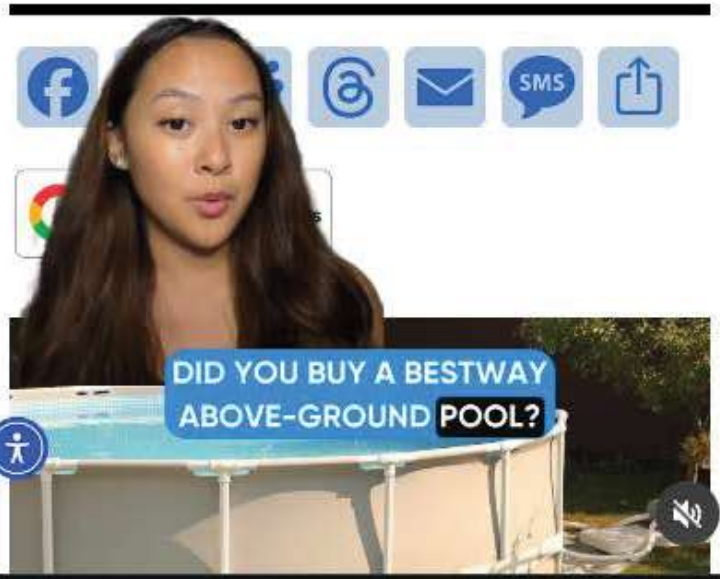

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The settlement covers Bestway-branded pools 48 inches or taller (including Power Steel and Steel Pro models) sold from 2008 through 2024.

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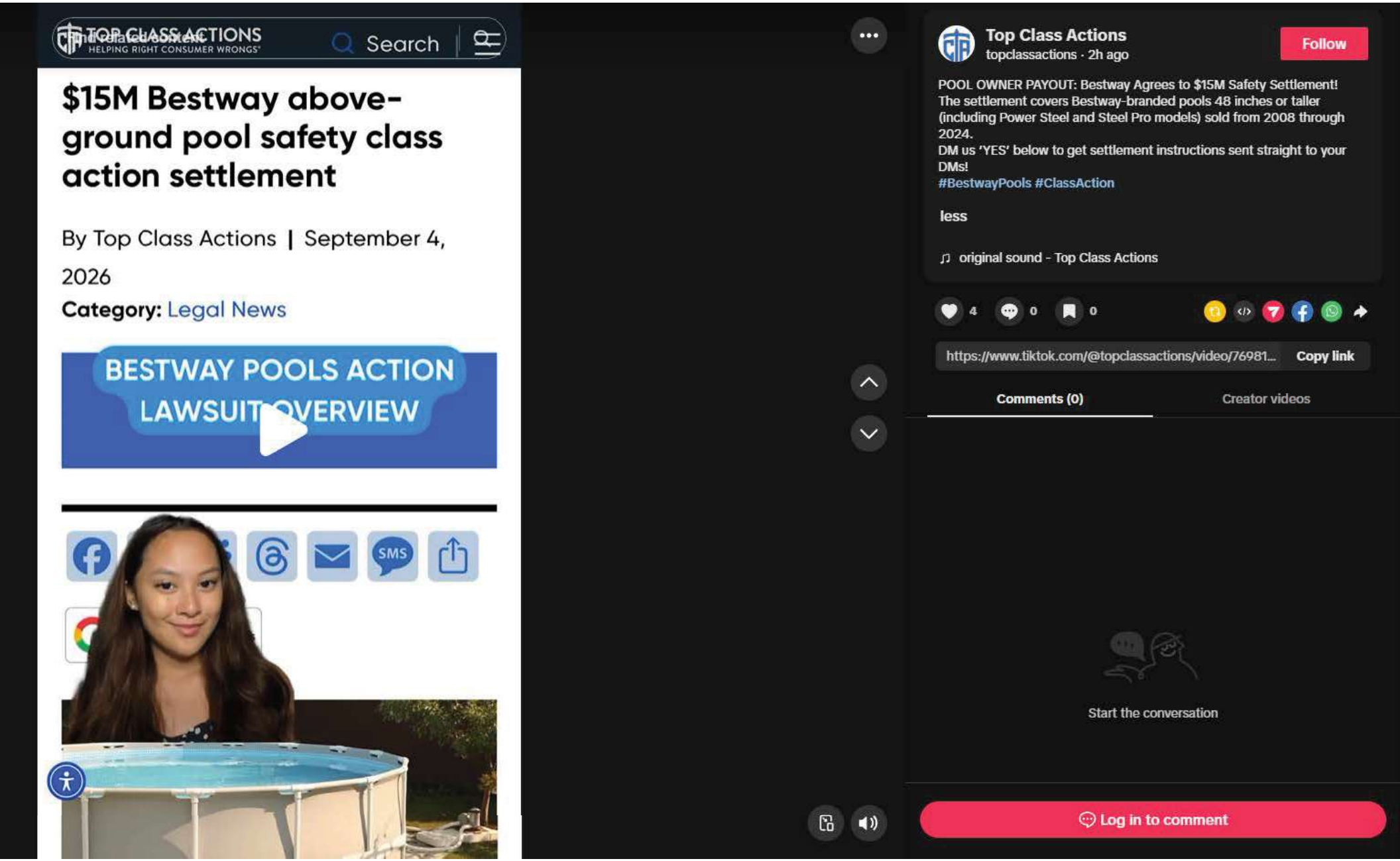
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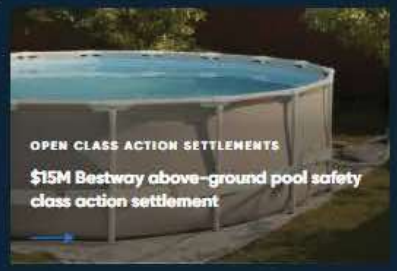

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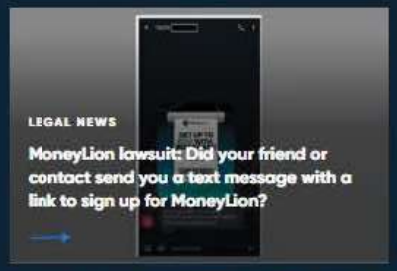

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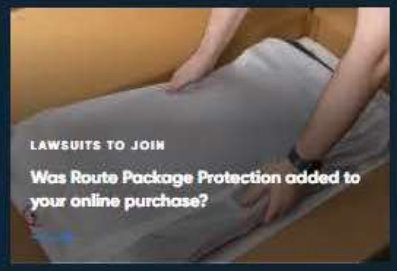

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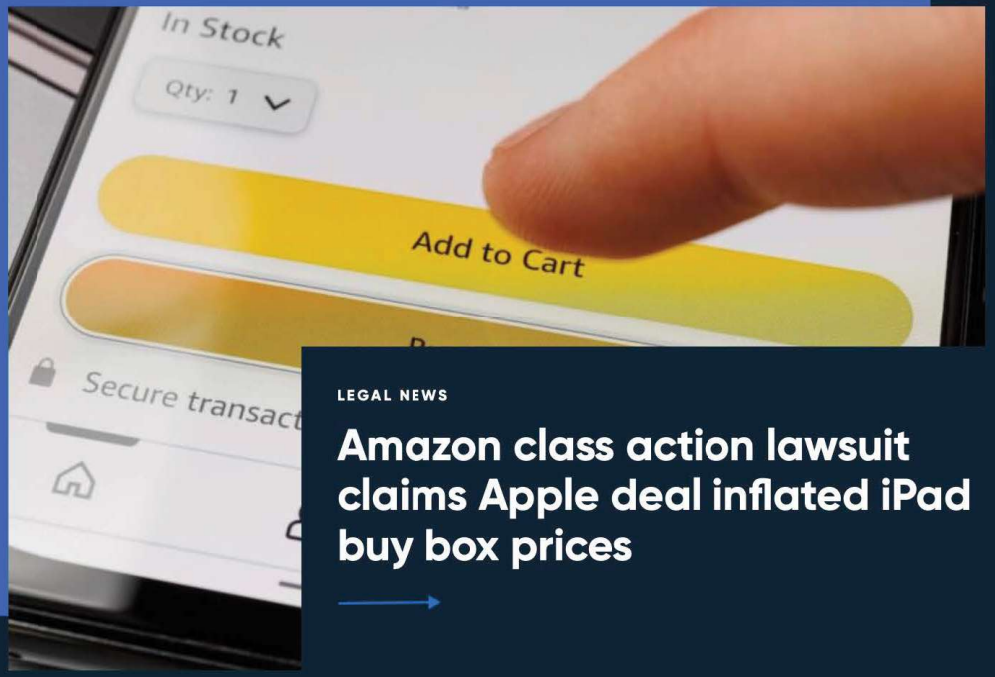

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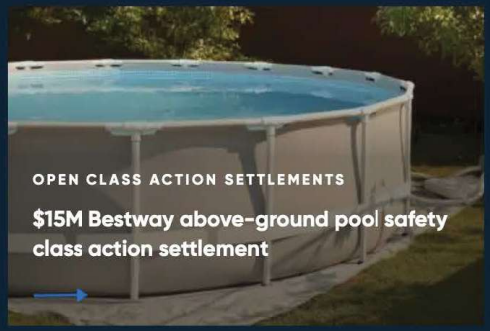

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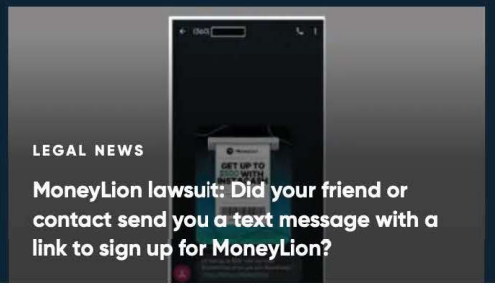

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Do You Own a Bestway Pool? You May Be Owed Money from a Settlement

If you bought certain Bestway above-ground pools between 2008 and 2024 you may be entitled to benefits from a class action settlement. The deadline to file is October 30.

A $15 million settlement now adds cash. Bestway denies the pools are defective, and no court has decided who is right.

If you can qualify you can receive $40 with no receipt, or 10% of what you paid with proof. The settlement covers Bestway-branded pools 48 inches or taller with straps outside the legs, sold 2008 through 2024, bought from a retailer. One claim per household, October 30 deadline. It does not release personal injury or wrongful death claims.

See if your pool qualifies

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