

The Honorable Richard A. Jones
(On Reference to the Honorable S. Kate Vaughn)

In The United States District Court
For The Western District Of Washington

Chris Hunichen, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

Atonomi LLC, a Delaware LLC, CENTRI
Technology, Inc., a Delaware Corporation,
Vaughan Emery, David Fragale, Rob
Strickland, Kyle Strickland, Don Deloach,
Wayne Wisehart, Woody Benson, Michael
Mackey, James Salter, and Luis Paris,

Defendants.

Atonomi LLC, a Delaware LLC,

Counterclaimant,

v.

Chris Hunichen,

Counter-Defendant.

Atonomi LLC, a Delaware LLC,

Third Party Plaintiff,

v.

David Patrick Peters, Sean Getzwiller, David
Cutler, Chance Kornuth, and Dennis Samuel
Blieden,

Counter-Defendants.

No. 2:19-cv-00615-RAJ-SKV

DECLARATION OF LUIGGY SEGURA
REGARDING NOTICE AND SETTLEMENT
ADMINISTRATION TO SAFT CLASS
MEMBERS

I, LUIGGY SEGURA declare as follows:

1. I am a Vice President at JND Legal Administration (“JND”), whose Corporate Office is located in Seattle, Washington. I am over 21 years of age and am not a party to the Action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. JND has been retained by Plaintiff and proposed Class Counsel to act as the Settlement Administrator in connection with the proposed settlement of the above captioned action (the “Action”).

3. To effectuate notice to the class, JND will email and mail a copy of the Class Notice to the SAFT Investors for whom information is available, using the identifying and contact information available for each Class Member. Prior to this Settlement, JND emailed and sent postcards to the SAFT investors in a related Settlement. JND successfully reached 73 out of the 76 SAFT investors. Ultimately, 49 of the SAFT investors filed a claim, including one of the three SAFT investors whose notice was undeliverable¹. Therefore, the information available will include the information submitted by the 49 SAFT investors in the related settlement. The Class Notice will provide a link to the Settlement Website that will have the Long Form Notice, important documents about the case, a mailing address and a toll-free number. Finally, JND will also run a press release on *PRNewswire* which will target the potential Class Members.

4. Class Members who wish to be eligible to receive a distribution from the Settlement Fund are required to complete and submit to JND a properly executed claim form by mail such that it is postmarked or received no later than the claim-filing deadline established by the Court, together with adequate supporting documentation for the transactions and holdings reported therein. The 49 Class Members who submitted a claim in the related Settlement will not be required

¹ The typical response rate to notices in securities matters is 15% to 25% of notices issued. In this matter, the starting response rate will be 68% as a result of the related settlement notice campaign.

to submit a Proof of Claim Form. JND will inform such Class Members that information previously submitted will be used to calculate final awards.

5. Each submitted claim form is reviewed upon receipt to verify that all required information had been provided. The documentation provided with each claim form is also reviewed for authenticity and compared to the information provided by the parties to JND to verify the claimant's identity and the purchase/acquisition transactions, sale transactions, and holdings listed on the claim form.

6. If a claim form is determined to be defective, a deficiency letter will be sent to the claimant describing the defect including, where applicable, what is necessary to cure the defect. The letter will advise the claimant that the submission of the appropriate information and/or documentary evidence to complete the claim form has to be sent within a specified time period from the date of the letter, or the claim form would be recommended for rejection to the extent that the deficiency or condition of ineligibility was not cured. The letter will also advise claimants that if they desire to contest the administrative determination, they are required to submit a written statement to JND contesting the rejection of their claim form and setting forth the basis for their request.

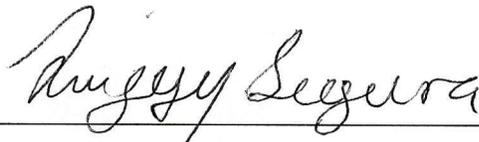
7. After the claims have been reviewed and final determination have been made as to which claims are valid, JND will calculate each claim pursuant to the Court-approved Plan of Allocation and *pro rata* distribution amount based on the total of all claims and the amount available for distribution in the Settlement Fund. Based on our experience, we expect the total for all claims to exceed the amount available in the Settlement Fund for distribution such that the fund will be fully exhausted and allocated to eligible claimants.

8. JND routinely works with The Huntington National Bank to handle the administration of settlements. Distribution payments will be sent with a specified period for each claimant to cash their payment (typically 90 or 180 days). For any checks that are not cashed, JND will conduct an outreach campaign to encourage cashing and providing claimants with reissued checks where applicable.

9. The process described herein is the standard notice and claims administration process for securities class action settlements.

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

Executed this 1st day of February 2024.

A handwritten signature in cursive script, reading "Luiggy Segura", is written over a horizontal line.

LUIGGY SEGURA