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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JOHN DOE, JOHN DOE II, JOHN DOE III,
JANE DOE, JANE DOE II, JANE DOE III,
JANE DOE IV, JANE DOE V, and ALEXIS
SUTTER, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

KAISER FOUNDATION HEALTH PLAN,
INC., KAISER FOUNDATION HOSPITALS,
and KAISER FOUNDATION HEALTH PLAN
OF WASHINGTON,

Defendants.

Case No. 3:23-cv-02865-EMC

**SUPPLEMENTAL REPLY IN FURTHER
SUPPORT OF (I) PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF PROPOSED
CLASS ACTION SETTLEMENT AND
PLAN OF ALLOCATION; AND (II) CLASS
COUNSEL'S MOTION FOR ATTORNEYS'
FEES, LITIGATION EXPENSES, AND
SERVICE AWARDS, AND
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT THEREOF**

Judge: Hon. Edward M. Chen
Date: May 7, 2026
Time: 1:30 p.m.
Court: REMOTE

1 Plaintiffs John Doe, John Doe II, Jane Doe, Jane Doe II, Jane Doe III, Jane Doe IV, Jane Doe
 2 V, and Alexis Sutter (collectively, the “Plaintiffs”), respectfully submit this Supplemental Reply,
 3 along with the Fourth Supplemental Declaration of Paul Mulholland of Strategic Claims Services,
 4 Inc. (“Fourth Mulholland Decl.”).

5 **I. INTRODUCTION**

6 On April 2, 2026, Plaintiffs and Class Counsel filed their Reply in further support of their (I)
 7 Motion for Final Approval of Proposed Class Action Settlement and Plan of Allocation and their (II)
 8 Motion for Attorneys’ Fees, Litigation Expenses, and Service Awards (“Reply”). At the time of filing,
 9 with the information available at the time, the Settlement Administrator, Strategic Claims Services,
 10 Inc. (“SCS”), was unable to definitively match a significant portion of the individuals who submitted
 11 opt-out forms with the names and email addresses found in the Settlement Class records. *See* Third
 12 Supplemental Declaration of Paul Mulholland of SCS (“Third Mulholland Decl.”) at ¶¶ 19-21, ECF
 13 No. 424. Since that time, SCS has continued its reconciliation efforts, but certain issues continue to
 14 prevent SCS from fully reconciling a small number of opt-out submissions with the Settlement Class
 15 records. *See* Fourth Mulholland Decl. at ¶ 10. Additionally, after Plaintiffs filed their Reply, Objector
 16 Dodson submitted additional information regarding his objection to the *cy pres* recipients (ECF No.
 17 429), an additional, (sealed) objection regarding a mailed notice received after the March 12, 2026
 18 claims deadline was docketed (ECF No. 428), and on May 1, 2026 SCS received an additional
 19 informal objection.¹ Class Counsel respectfully submits this Supplemental Reply to provide the Court
 20 with their position on these issues, which would result in 25,749 valid requests for exclusion.

21 **II. ARGUMENT**

22 **A. The Claims Reconciliation Process**

23 With respect to the opt-out reconciliation process, three issues remain:

- 24 • Several opt-out submissions could not be definitively linked to Settlement Class

26 ¹ An additional individual also submitted a request to SCS regarding this same issue and asked that it
 27 be provided to the Court, which is attached as Exhibit A to the Fourth Mulholland Decl., and is
 28 referred to herein as Ticket #194093. The additional information objection received by SCS on May
 1 is attached as Exhibit B to the Fourth Mulholland Decl., and is referred to herein as the May 1
 objection.

1 Members on the Class List;

- 2 • Certain individuals did not include their Settlement Class IDs on their Opt-Out Forms;
3 and
4 • Certain individuals submitted both Claim Forms and Opt-Out Forms.

5 None of these issues should prevent Final Approval from being entered.

6 **1. Individuals Who Submitted Otherwise Valid Opt-Outs Should be**
7 **Excluded from the Settlement**

8 Class Counsel's position is that individuals who have substantively complied with the opt-out
9 requirements, but could not be definitively linked to the Class List, should be excluded from the
10 Settlement. These individuals have submitted individually signed opt-out forms, as required by the
11 Court, sufficiently demonstrating that they do not want to participate in the Settlement. These
12 individuals have also submitted personal identifying information, such as address and telephone
13 number, that would also allow these individuals to be definitively identified. For example, for many
14 of these individuals, only their names and email addresses appear on the Class List. If it so chooses,
15 confirmation of the identity of these individuals could be accomplished by Kaiser running this
16 information across its own records. Also, these individuals could provide the Settlement Class ID
17 reflected on the Notice sent to them,² which would allow Kaiser to definitively match them to Class
18 List. In any case, these individuals have done enough to warrant exclusion from the Class.

19 And notably, none of this work is required at this time. To the extent any of these individuals
20 later choose to proceed with claims, Kaiser is not barred from requesting additional information such
21 as their Medical Record Number or other information to confirm if and when they were Kaiser
22 Members. Exclusion from the Class in no way supports future claims if these individuals are not
23 actual class members; if they are not actual Class members they have no claim now or in the future.

24 _____
25 ² This Court previously ordered that "counsel for Objectors shall be given the Claim/Settlement ID
26 Numbers for their clients" after counsel for Objectors submitted declarations with their client lists.
27 See Minute Entry at 1, ECF No. 389. Because not all of those individuals could be definitively located
28 on the Class List at the time, SCS provided provisional Claim/Settlement ID Numbers those
individuals, with the expectation that it would be able to match those names to the Class List after
additional information was provided on the opt-out forms. With that additional information, SCS was
able to match some, but not all, of Objectors' clients provided with provisional Claim/Settlement ID
Numbers to Settlement Class Members on the Class List.

1 Thus, there is no prejudice to Kaiser by excluding these individuals from the Class now.

2 **2. Individuals Who Submitted Opt-Out Forms Without a Settlement Class**
3 **ID Should be Excluded From the Settlement**

4 Class Counsel's position is that no opt-out should be rejected for merely failing to include a
5 Settlement Class ID provided there is sufficient information to accept the opt-out. No claim or opt-
6 out should be rejected based on a hyper-technical, formalistic reading of what is required under the
7 Settlement Agreement. *See, e.g., Facciola v. Greenberg Traurig LLP*, 2012 WL 12827046, at *1 (D.
8 Ariz. Aug. 31, 2012) ("We will not invalidate an exclusion request for failure to strictly comply with
9 the class notice opt out requirements. Such a formalistic approach implicates an individual's due
10 process rights to opt out."); *Burnell v. Swift Transp. Co.*, 2020 WL 13249365, at *3 (C.D. Cal. June
11 25, 2020) (granting Rule 60(b) motion where class member's exclusion request was "timely,
12 unambiguous, and included all necessary, identifying information," but was rejected for missing
13 certain details). To the extent SCS, as a neutral party, determines that it has sufficient information to
14 recognize an opt-out despite the lack of a Settlement Class ID on the opt-out form, that opt-out should
15 be accepted.

16 **3. Individuals Who Submitted Both Claim Forms and Opt-Out Forms**
17 **Should Be Included in the Settlement Absent Rescinding or**
18 **Withdrawing Their Claims**

19 Class Counsel and Kaiser agree that individuals who submitted both claim forms and opt-out
20 forms should be included as Settlement Class Members unless they have submitted individual
21 confirmations rescinding or withdrawing their Claim Forms.

22 As this Court has repeatedly recognized, the Court must ensure any class member seeking to
23 opt out must do so individually based on an "informed, individual decision." *See* Order at 7, ECF No.
24 384 (quoting *In re 23andMe, Inc. Customer Data Sec. Breach Litig.*, No. 24-md-03098-EMC, 2024
25 U.S. Dist. LEXIS 219622, at *84 (N.D. Cal. Dec. 4, 2024)). For Class Members who submitted both
26 claim forms and opt-out forms, the decision is less clear. Those Class members should be required to
27 submit an additional signed verification to indicate an individual decision to opt-out rather than
28 proceed with the claim they filed. In fact, where class members truly wanted to opt out after
submitting claims, they have rescinded Claim Forms. For example, 1,342 Labaton Opt-Outs, 73

1 Bryson Opt-Outs, 511 Potter Handy Opt-Outs, and 230 other Opt-Outs have submitted individual
 2 confirmation rescinding or withdrawing their Claim Forms and it is undisputed that those Opt-Out
 3 decisions should be honored.³ See Fourth Mulholland Decl., ¶ 8.

4 **B. The Court Should Deny Objections to the *Cy Pres* Recipients, Mailed Notices**
 5 **Received After March 12, 2026, and the Claims Process**

6 With respect to the *cy pres* recipients, Class Counsel respectfully submits that including the
 7 Privacy Rights Clearinghouse as an additional *cy pres* recipient is appropriate. As this case involves
 8 healthcare privacy, the Institute for Public Health Innovation’s public health mission provides an
 9 appropriate nexus to the healthcare aspect of the lawsuit, and the Privacy Rights Clearinghouse’s
 10 privacy-related mission also provides an appropriate nexus to the privacy aspect of this lawsuit.
 11 Plaintiffs and Class Counsel have no relationship to either of these proposed *cy pres* recipients. The
 12 Parties are unaware of a single, unaffiliated organization that specializes in healthcare privacy, and
 13 Objector Dodson has not identified any. Accordingly, this objection should be denied.

14 In addition, the sealed objection lodged at ECF No. 428 raises the same concerns as Ticket
 15 #194093 regarding mailed notices received after March 12, 2026. As noted in the Third Mulholland
 16 Declaration, SCS sent notice to all 13,134,307 Settlement Class Members by the January 16, 2026
 17 deadline. Third Mulholland Decl. ¶ 7. However, a number of those emails were returned as
 18 undeliverable, as is inevitable with a Class of this size. *Id.* at ¶ 8. Accordingly, SCS worked with
 19 Kaiser to obtain mailing addresses individuals who could not be reached by email and completed
 20 sending notices to those individuals by regular mail on March 19, 2026. *Id.* As a result, certain
 21 individuals where a second attempt at notice was made did not receive the mailed notice until after
 22 March 12, 2026. Class Counsel has explained this to the Settlement Class Member whose objection
 23 was lodged at ECF No. 428, as well as the Settlement Class Member who submitted Ticket #194093,
 24 *and these Settlement Class Members have now submitted claims.* Class Counsel believes that these
 25 claims, and any other valid claims submitted after March 12, 2026, should be honored and intends to

26 _____
 27 ³ “Labaton Opt-Outs” refers to opt-outs submitted by Labaton Keller Sucharow LLP on behalf of
 28 their clients, “Potter Handy Opt-Outs” refers to opt-outs submitted by Potter Handy, LLP on behalf
 of their clients, and “Bryson Opt-Outs” refers to opt-outs submitted by Bryson Harris Suci Demay
 on behalf of their clients.

1 include those claims as part of the Settlement distribution unless directed otherwise by the Court.

2 Additionally, the objection sent to SCS on May 1, 2026 should be denied as well. Not only
3 was this objection submitted after the deadline, but it is undisputed that this objector was sent an
4 emailed notice on January 13, 2026 and filed a claim online on April 24, 2026. Fourth Mulholland
5 Decl., at ¶ 6. As previously noted, Class Counsel believes that all valid claims received on or before
6 May 6, 2027—one day before the Fairness Hearing—should be honored. *See* ECF No.425-4, at 6 fn.
7 11. As such, any objection regarding insufficient notice or insufficient time to file a claim should be
8 rejected. Indeed, the claims process here followed standard practice necessary to verify Settlement
9 Class members’ claims and resulted in a claims rate that is exactly in line with the 5% to 10% claims
10 rate anticipated by SCS, the Court, and Parties at the Preliminary Approval stage, and is consistent
11 with other settlements. *See* ECF No. 345-5, at ¶ 23.

12 **III. CONCLUSION**

13 For the foregoing reasons and those set forth in the Opening Papers, Plaintiffs and Class
14 Counsel respectfully request that the Court approve the Settlement, the Plan of Allocation, and the
15 request for attorneys’ fees, litigation expenses, and service awards.

16 Dated: May 4, 2026

17 Respectfully submitted,

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JOHN DOE, JOHN DOE II, JOHN DOE III,
JANE DOE, JANE DOE II, JANE DOE III,
JANE DOE IV, JANE DOE V, and ALEXIS
SUTTER, Individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

KAISER FOUNDATION HEALTH PLAN,
INC., KAISER FOUNDATION HOSPITALS,
and KAISER FOUNDATION HEALTH
PLAN OF WASHINGTON,

Defendants.

Case No. 3:23-cv-02865-EMC

**FORTH SUPPLEMENTAL DECLARATION
OF PAUL MULHOLLAND OF STRATEGIC
CLAIMS SERVICES, INC. CONCERNING
THE DISSEMINATION OF NOTICE TO
THE SETTLEMENT CLASS, NUMBER OF
CLAIMS RECEIVED, AND NUMBER OF
OPT-OUT REQUESTS RECEIVED**

District Judge: Hon. Edward M. Chen
Magistrate Judge: Hon. Peter H. Kang

Consolidated Complaint Filed: Dec. 6, 2024
Trial Date: Jan. 25, 2027

I, Paul Mulholland, declare as follows:

1. I am the President and Chief Executive Officer of Strategic Claims Services, Inc. (“SCS”), a nationally recognized class action administration firm. SCS has been retained by Class Counsel, and approved by the Court, to serve as the Settlement Administrator in connection with the settlement of the above-captioned action (“Action”).

1 1,342 Labaton Opt-Outs, 73 Bryson Opt-Outs, 511 Potter Handy Opt-Outs, and 230 other Opt-Outs
2 have submitted individual confirmation rescinding or withdrawing their Claim Forms.¹

3 9. Additionally, 5,773 Opt-Outs were submitted without a valid Unique ID. In those
4 instances, SCS attempted to find such individuals on the class list using other personally identifying
5 information. SCS was able to identify Unique IDs for 3,522 of the 5,773 records missing a valid
6 Unique ID on the class list. When a Unique ID was located, and the opt-out was otherwise valid,
7 SCS categorized this as a valid opt-out.
8

9 10. Additionally, certain names and email addresses for a portion of the opt-outs could
10 not be found in the Settlement Class records. SCS has performed additional work to match up the
11 data where possible, including obtaining additional address data from Defendant and the opt-outs'
12 counsel. To date, with current information, a portion of the mass-opt outs still cannot be definitively
13 associated with specific Kaiser Members included on the Settlement Class list. Additional
14 information would be required to be provided by Kaiser and/or opt out counsel in order for SCS to
15 locate these individuals. It is my understanding that this additional information was requested but
16 not provided. There are currently 2,237 records that fall into this category where they cannot be
17 matched up without additional information.

18 11. There were 121 requests for exclusions received without signatures. Those requests
19 for exclusion were not recognized as valid opt-outs.

20 12. As of April 30, 2026, a total of 25,749 individuals have submitted what SCS has
21 determined to be a valid request for exclusion from the Settlement Class. This number: (a) excludes
22 all requests for exclusion that were received without signatures; (b) excludes anyone who submitted
23 both a Claim Form and Opt-Out form and who as of April 30, 2026 has not confirmed whether they
24 intended to opt out or remain in the Settlement Class; (c) includes all opt-outs that SCS cannot
25

26 ¹ “Labaton Opt-Outs” refers to opt-outs submitted by Labaton Keller Sucharow LLP on behalf of
27 their clients, “Potter Handy Opt-Outs” refers to opt-outs submitted by Potter Handy, LLP on
28 behalf of their clients, and “Bryson Opt-Outs” refers to opt-outs submitted by Bryson Harris Suci
Demay on behalf of their clients.

1 definitively locate on the class list but who otherwise submitted valid Opt-Out forms; and (d)
2 includes all opt-outs submitted without a Unique ID but that were otherwise valid and that SCS was
3 able to locate on the class list.

4 **UPDATED REPORT ON CLAIMS SUBMITTED**

5 13. As of the March 12, 2026 claims filing deadline, SCS had received 755,551 Claim
6 Forms, including 726,132 submitted online and 29,419 submitted via email or mail.

7 14. After the March 12, 2026 claims filing deadline, SCS has received an additional
8 17,932 Claim Forms through April 30, 2026. SCS is currently processing these additional Claim
9 Forms.

10 **FRAUD PREVENTION IN PROCESSING PAYMENT FORMS**

11 15. SCS has implemented and continued the process of monitoring the various measures
12 to deter and prevent fraud in this matter as described in my third supplemental declaration (Dkt No.
13 424).

14 16. SCS's settlement administration costs are 1,484,424.72 as of April 30, 2026. This
15 amount is in line with the estimate provided by SCS at the preliminary approval stage (i.e., \$1.7 to
16 \$2.4 million).

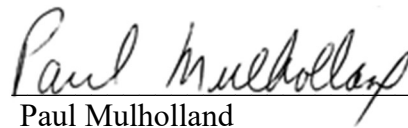
17
18 I declare under penalty of perjury that the foregoing is true and correct.

19

20 Signed this 4th day of May 2026 in Media, Pennsylvania.

21

22


Paul Mulholland

23

24

25

26

27

28

EXHIBIT A

FILED UNDER SEAL

EXHIBIT B

FILED UNDER SEAL

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(Additional Attorneys Listed on Signature Page)

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JOHN DOE, JOHN DOE II, JOHN DOE III,
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KAISER FOUNDATION HEALTH PLAN,
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and KAISER FOUNDATION HEALTH PLAN
OF WASHINGTON,

Defendants.

Case No. 3:23-cv-02865-EMC

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PURSUANT TO CIVIL L.R. 7-11 AND 79-5**

Judge: Hon. Edward M. Chen

1 Plaintiffs John Doe, John Doe II, Jane Doe, Jane Doe II, Jane Doe III, Jane Doe IV, Jane Doe
 2 V, and Alexis Sutter (collectively, “Plaintiffs”), move pursuant to Civil Local Rules 7-11 and 79-5 to
 3 seal exhibits to the Fourth Supplemental Declaration of Paul Mulholland of Strategic Claims Services,
 4 Inc. Concerning the Dissemination of Notices to the Settlement Class, Number of Claims Received,
 5 and Number of Opt-Out Requests (“Supp. Mulholland Decl.”) because they contain personal
 6 identifying information, including the Settlement Class Members’ names, email addresses, phone
 7 numbers, home addresses, and/or unique identifiers. Specifically, Plaintiffs seek to seal the following
 8 portions of the below-listed documents:

Document	Portion to be Sealed
Supp. Mulholland Decl., Exhibit A	In its entirety.
Supp. Mulholland Decl., Exhibit B	In its entirety.

9
 10
 11 As required by Civil Local Rules 79-5(d) and 7-11(a), Plaintiffs simultaneously submit (1)
 12 the Declaration of Tyler S. Graden in Support of Plaintiffs’ Administrative Motion to File Under Seal
 13 (“Graden Decl.”); (2) unredacted versions of the exhibits; and (3) a proposed order identifying the
 14 portions to be sealed.

15 **I. LEGAL STANDARD**

16 Courts have broad discretion to seal judicial records from public disclosure when there are
 17 “compelling reason[s]” to do so. *Ctr. for Auto Safety v. Chrysler Grp., LLC*, 809 F.3d 1092, 1097
 18 (9th Cir. 2016) (quoting *Nixon v. Warner Commc’ns, Inc.*, 435 U.S. 589, 598-99 (1978)). Courts
 19 generally permit sealing of “personal identifiers.” *Ennis v. Aetna Life Ins. Co.*, 2018 WL 4636197, at
 20 *4 (N.D. Cal. Sep. 24, 2018). Courts also permit the redaction of “the name[s] of the class member[s]
 21 . . . to protect th[ose] individual[s]’ privacy interests.” *O’Connor v. Uber Techs., Inc.*, 2017 WL
 22 6504064, at *2 (N.D. Cal. Sep. 6, 2017) (Chen, J.).

23 **II. ARGUMENT**

24 Plaintiffs seek to file under seal documents containing the names, email addresses, phone
 25 numbers, home addresses, and/or other unique identifiers of Settlement Class Members who opted
 26 out of the Settlement or submitted objections to the Settlement that were not filed with the Court.
 27
 28

1 Additionally, there are compelling reasons to seal the personally identifiable information
 2 (including the name, email address, phone number, home address, unique identifiers, and/or other
 3 personally identifying information) of the objecting Settlement Class Members and of Settlement
 4 Class Members opting out of the Settlement. Specifically, sealing this information will protect the
 5 privacy of that Settlement Class Members. *See Am. Auto. Ass'n of N. Cal., Nev. & Utah v. Gen.*
 6 *Motors LLC*, 2019 WL 1206748, at *2 (N.D. Cal. Mar. 14, 2019) (finding compelling reasons to seal
 7 personally identifiable information, “including names, addresses, phone numbers, and email
 8 addresses”); *Benedict v. Hewlett-Packard Co.*, 2014 WL 233827, at *3 (N.D. Cal. Jan. 21, 2014)
 9 (granting motion to seal personal information, including a home address, phone number, and email
 10 address). Indeed, courts in the Ninth Circuit have found that it is necessary to seal personal
 11 information, such as home address, phone number, and email address, “to protect an individual’s
 12 privacy interest and to prevent exposure to harm or identity theft.” *Id.* (citing *Nursing Home Pension*
 13 *Fund v. Oracle Corp.*, 2007 WL 3232267, at *2 (N.D. Cal. Nov. 1, 2007)); *see also O’Connor*, 2017
 14 WL 6504064, at *2 (granting redaction of names of class member discussed in a declaration to
 15 “protect that individual’s privacy interests”).

16 Plaintiffs here have narrowly tailored this request to seal only documents containing personal
 17 identifying information, including the Settlement Class Members’ names, email addresses, phone
 18 numbers, home addresses, and unique identifiers.

19 **III. CONCLUSION**

20 For the reasons discussed above and in the supporting Graden Declaration, Plaintiffs
 21 respectfully ask the Court to issue an order sealing the designated materials.

22 DATED: May 4, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 4, 2026, I served a true and correct copy of the foregoing documents upon the following counsel by email:

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JOHN DOE, JOHN DOE II, JOHN DOE III,
JANE DOE, JANE DOE II, JANE DOE III,
JANE DOE IV, JANE DOE V, and ALEXIS
SUTTER, Individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

KAISER FOUNDATION HEALTH PLAN,
INC., KAISER FOUNDATION HOSPITALS,
and KAISER FOUNDATION HEALTH PLAN
OF WASHINGTON,

Defendants.

Case No. 3:23-cv-02865-EMC

**DECLARATION OF TYLER S. GRADEN IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PURSUANT TO CIVIL
L.R. 7-11 AND 79-5**

Judge: Hon. Edward M. Chen

1 I, Tyler S. Graden, hereby declare as follows:

2 1. I am a partner with the law firm Kessler Topaz Meltzer & Check, LLP, counsel for
 3 Plaintiffs John Doe, John Doe II, Jane Doe, Jane Doe II, Jane Doe III, Jane Doe IV, Jane Doe V, and
 4 Alexis Sutter (“Plaintiffs”) in the above-captioned matter. I make this declaration based on my
 5 personal knowledge and would be competent to testify to the matters stated in this declaration.

6 2. Pursuant to Civil L.R. 7-11 and 79-5, I make this declaration in support of Plaintiffs’
 7 Administrative Motion to Seal (the “Administrative Motion”).

8 3. Plaintiffs request that Exhibits A and B to the Fourth Supplemental Declaration of
 9 Paul Mulholland of Strategic Claims Services, Inc. Concerning the Dissemination of Notices to the
 10 Settlement Class, Number of Claims Received, and Number of Opt-Out Requests (“Supp.
 11 Mulholland Decl.”) be filed under seal because they contain personal identifying information,
 12 including the Settlement Class Members’ names, email addresses, phone numbers, home addresses,
 13 and/or unique identifiers.

Portion to be Sealed	Basis for Sealing
Supp. Mulholland Decl., Exhibit A	In its entirety.
Supp. Mulholland Decl., Exhibit B	In its entirety.

14
 15
 16
 17 4. Per Local Rule 79-5, Plaintiffs have attached unredacted versions of the documents
 18 for which sealing is sought.

19
 20
 21 I declare under penalty of perjury, under the laws of the United States and the State of
 22 California, that the foregoing is true and correct to the best of my knowledge. This declaration was
 23 executed on May 4, 2026, in Radnor, Pennsylvania.

24 */s/ Tyler S. Graden*
 25 Tyler S. Graden

26
 27
 28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JOHN DOE, JOHN DOE II, JOHN DOE III,
JANE DOE, JANE DOE II, JANE DOE III,
JANE DOE IV, JANE DOE V, and ALEXIS
SUTTER, individually and on behalf of all
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KAISER FOUNDATION HEALTH PLAN,
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and KAISER FOUNDATION HEALTH PLAN
OF WASHINGTON,

Defendants.

Case No. 3:23-cv-02865-EMC

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PURSUANT TO CIVIL L.R. 7-11 AND 79-5**

Judge: Hon. Edward M. Chen

Having considered Plaintiffs' Administrative Motion to File Under Seal Pursuant to Civil L.
R. 7-11 and 79-5 ("Administrative Motion"),

IT IS HEREBY ORDERED that Plaintiffs' Administrative Motion is **GRANTED**.

IT IS HEREBY FURTHER ORDERED that the following documents shall be filed under
seal:

Document	Portion to be Sealed
Supp. Mulholland Decl., Exhibit A	In its entirety.
Supp. Mulholland Decl., Exhibit B	In its entirety.

DATED: _____, 2026

HONORABLE EDWARD M. CHEN
UNITED STATES DISTRICT JUDGE