- 1		
1	SAXENA WHITE P.A. David R. Kaplan (SBN 230144)	
2	dkaplan@saxenawhite.com 505 Lomas Santa Fe Dr., Suite #180	
3	Solana Beach, CA 92075 Telephone: (858) 997-0860	
4	Facsimile: (858) 369-0096	
5	MOTLEY RICE LLC Max N. Gruetzmacher (pro hac vice)	
6	mgruetzmacher@motleyrice.com Christopher F. Moriarty (pro hac vice)	
7	cmoriarty@motleyrice.com 28 Bridgeside Blvd.	
8	Mt. Pleasant, SC 29464 Telephone: (843) 216-9000	
9	Counsel for Lead Plaintiffs Pompano Beach Police	
10	and Firefighters' Retirement System and KBC Asset Management NV and Lead Counsel for the Proposed	l
11	Settlement Class	
12	UNITED STATES DIS	
13	NORTHERN DISTRICT	
14	STEVEN LEVENTHAL, Individually and on Behalf of All Others Similarly Situated,	Case No.: 5:21-cv-09953-PCP
15	Plaintiff,	SUPPLEMENTAL DECLARATION OF KATHLEEN BRAUNS REGARDING:
16	Vs.	(A) CONTINUED MAILING OF THE POSTCARD NOTICE; (B) SETTLEMENT
17	CHEGG, INC., DANIEL L. ROSENSWEIG,	WEBSITE MAINTENANCE; (C) CONTACT CENTER SERVICES; (D) DEPORTS ON OR RECTIONS AND
18 19	ANDREW J. BROWN, and NATHAN SCHULTZ,	(D) REPORTS ON OBJECTIONS AND REQUESTS FOR EXCLUSION; AND (E) CLAIMS RECEIVED TO DATE
20	Defendants.	(E) CLAIMS RECEIVED TO DATE
21		
22		
23		
24		
25		
26		
27		
28	Drawing Dea ISO Mation for	
- 1	Brauns Dec. ISO Motion for	

Final Approval Case No. 5:21-cv-09953-PCP I, Kathleen Brauns, declare as follows:

- 1. I am a Project Manager of the Class Action Administration Division of A.B. Data, Ltd. ("A.B. Data"), whose corporate office is located in Milwaukee, Wisconsin. I am over 21 years of age and am not a party to the Action. The following statements are based on my personal knowledge and information provided by A.B. Data employees working under my supervision, and if called on to do so, I could and would testify competently thereto.
- 2. On December 19, 2024, the Court entered its Modified Order Preliminarily Approving Settlement and Providing for Notice (the "Preliminary Approval Order," ECF No. 192), which granted Lead Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement (ECF No. 189); and approved the long-form Notice (ECF No. 189-2 Ex. A-1), Claim Form (ECF No. 189-2 Ex. A-2), Summary Notice (ECF No. 189-2 Ex. A-3), and Postcard Notice (ECF No. 189-2 Ex. A-4).
- 3. Pursuant to the Preliminary Approval Order, A.B. Data is authorized to act as the Claims Administrator in connection with the Action. I submit this declaration as a supplement to my previously filed declaration, the Declaration of Kathleen Brauns Regarding: (A) Mailing of the Postcard Notice; (B) Publication of the Summary Notice; (C) the Settlement Website; (D) Contact Center Services; and (E) Report on Exclusions and Objections, dated February 26, 2025 (ECF No. 195-3, the "Initial Mailing Declaration").

CONTINUED MAILING OF THE POSTCARD NOTICE

4. As more fully stated in my Initial Mailing Declaration, as of February 26, 2025, A.B. Data had mailed a total of 91,343 copies of the Postcard Notice to potential Settlement Class Members, including approximately 4,933 banks, brokers, and other nominees contained in AB Data's proprietary database of the largest and most common banks brokers, and other nominees (the "Broker Mailing Database"), and all individuals and entities subsequently identified by those banks, brokers, and nominees as potential Settlement Class Members.

¹ Unless otherwise noted, all capitalized terms not defined herein shall have the same definitions as in the Stipulation and Agreement of Settlement ("Stipulation" or "Settlement Agreement") filed on November 6, 2024 (ECF No. 189-2).

Since the execution of the Initial Mailing Declaration, A.B. Data has mailed an

1 2 additional 1,976 Postcard Notices to potential Settlement Class Members and their nominees. Therefore, as of the date of this Declaration, an aggregate of 93,319 Postcard Notices have been 3 4 mailed to potential Settlement Class Members and their nominees. In addition, A.B. Data has re-5 mailed a total of 513 Postcard Notices to person who original mailings were returned by the U.S. Postal Service ("USPS") and for whom updated addresses were provided to A.B. Data by the 6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

USPS.

5.

SETTLEMENT WEBSITE

- 6. A.B. Data continues to maintain the website designed and implemented for the Settlement, www.CheggSecuritiesLitigation.com (the "Settlement Website"). The Settlement Website provides information regarding the proposed Settlement, including the deadlines for exclusion, objection, and claim filing, as well as the date and time of the Court's Settlement Hearing. Additionally, important documents such as the Stipulation, Preliminary Approval Order, long-form Notice, Claim Form, and Complaint are available for download on the Settlement Website. Furthermore, the website includes contact information for A.B. Data and Lead Counsel, including a toll-free telephone number for Settlement Class Members to obtain additional information.
- 7. A.B. Data will continue operating, maintaining and, as appropriate, updating the Settlement Website with relevant case information until the conclusion of this administration.

CONTACT CENTER SERVICES

- 8. A.B. Data continues to maintain the case specific, toll-free telephone helpline, (877) 884-2550, with an interactive voice response system and live operators to respond to potential Settlement Class Member who have questions about the Action and the Settlement. A.B. Data has promptly responded to each telephone inquiry and will continue to operate and maintain the tollfree telephone helpline until the conclusion of the administration.
- 9. As of April 10, 2025, 222 calls had been received by the toll-free telephone from potential Settlement Class Members. The total length of these calls was approximately 888

1 2

minutes. I understand that all inquiries received through the toll-free telephone hotline were appropriately addressed.

REPORT ON EXCLUSIONS AND OBJECTIONS

- 10. Pursuant to the Preliminary Approval Order, the Postcard Notice, long-form Notice, Summary Notice, and Settlement Website inform potential Settlement Class Members that written requests for exclusion are to be sent to the Claims Administrator such that they are received no later than March 27, 2025. The long-form Notice also sets forth the information that must be included in each request for exclusion. As of the date of this Declaration, A.B. Data has received five (5) requests for exclusion from individual investors. A.B. Data has not received any exclusion requests from institutional investors. In total, the requests include nine shares of Chegg common stock purchased during the Settlement Class Period. Copies of the requests along with a summary are attached hereto as Exhibit A.² In the interest of privacy, the requests for exclusion have been redacted to remove the requestor's street address, email addresses, and telephone numbers.
- 11. Pursuant to the Preliminary Approval Order, the Postcard Notice, long-form Notice, Summary Notice, and Settlement Website informs Settlement Class Members wishing to object to the Settlement, the proposed Plan of Allocation, or Lead Counsel's motion for attorneys' fees and Litigation Expenses that they are required to submit their objection in writing such that the request is postmarked or filed with the Court no later than March 27, 2025.
- 12. A.B. Data is aware of an objection to the Settlement filed by Ethan Fieldman on March 27, 2025 (ECF No. 196). Included with the objection were the details of two accounts showing Mr. Fieldman's transactions in Chegg common stock during the Settlement Class Period. At the request of Lead Counsel, A.B. Data reviewed these transactions to determine if either account suffered a Recognized Loss under the Court-approved Plan of Allocation.
- 13. A.B. Data determined the first account, where 20 shares were purchased during the Settlement Class Period, did not suffer a Recognized Loss under the Plan of Allocation and thus

² Three of the requests for exclusion did not quantify the number of shares purchased during the Settlement Class Period. AB Data has notified these individuals of the omission and requested that they supply the missing information.

were not damaged by the alleged misconduct and are outside of the Settlement Class. The second account, which included 10 shares purchased during the Settlement Class Period has a Recognized Claim of \$281.15. Mr. Fieldman submitted a Claim to A.B. Data for the second account, but he has not submitted a Claim for the first account. AB Data is evaluating whether the Claim submitted by Mr. Fieldman for the second account is valid and includes sufficient supporting documentation.

CLAIMS RECEIVED TO DATE

14. Pursuant to the Preliminary Approval Order, Claims are to be submitted no later than March 31, 2025. As of the date of this Declaration, A.B. Data has received a total of 272,709 Claims. As part of the claims administration process, A.B. Data will evaluate and process all Claims submitted. Claimants will have the opportunity to address any deficiencies or request judicial review if their Claim is denied. Once all claims have been fully processed, quality assurance reviews conducted, and final administrative determinations made, A.B. Data will present its administrative report on the received Claims to the Court, along with a proposed distribution plan. Subsequently, A.B. Data will disburse the *pro rata* share of the Net Settlement Fund to Authorized Claimants, as calculated under the Plan of Allocation, via mail or wire transfer.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on April 10, 2025.

Kathleen Brauns

EXHIBIT A

Leventhal v. Chegg, Inc., et al

Case No. 5:21-cv-09953 (N.D. Cal.)

Exclusion Report

Exclusion Number	Name	Received	Number of Shares
1	Regan Cole	02/24/2025	8
2	Juliias Ellis	03/03/2025	N/A
3	Saif Banat	03/19/2025	N/A
4	Reis Enterprises Ltd. (Leinah Elashi, Director)	03/20/2025	N/A
5	Mara Pajuelo	03/24/2025	1

Exclusion 1

Received: February 24, 2025

Name: Regan Cole	
Address:	
Phone:	

Statement of Exclusion: I, Regan Cole, request exclusion from the Settlement Class in Leventhal v. Chegg, Inc., et al., Case No. 5:21-cv-09953 (N.D. Cal.)

Shares Held at Beginning of Settlement Period (May 5, 2020): 5 shares

of Shares Bought and Sold During Settlement Period (May 5, 2020): The number of Chegg shares of common stock that the person or entity requesting exclusion purchased or acquired and sold during the Settlement Class Period (May 5, 2020 – November 1, 2021), as well as the dates and prices of each such purchase or acquisition and sale, and the number of shares held at the beginning of the Settlement Class Period.

# of Shares	Purchase or Sell?	Purchase / Sell Date	Price at Purchase / Sell
5	Sell	05/21/2020	\$62.89
8	Purchase	06/30/2020	\$67.38

Signature of Person Requesting Exclusion:

R. Cole Page 10 of Case 5:21-cv-09953-PCP Document 198-1 18 FEB 2025 PM 2 L Exclusions, Chegg Securities Litigation clo A.B. Data, Ltd.

PO BOX 173001

Milwaukee, WI 63217

59217-801201 իդիկիկիկիրինեմիթիկիկիիիդոկիկ

Exclusion 2

Received: March 3, 2025

Chegg, Inc. Securities Litigation, Exclusions c/o A.B. Data, Ltd P.O. Box 173001 Milwaukee, WI 53217

February 21, 2025

Re: Leventhal v. Chegg, Inc., et al

Dear Exclusions Team:

I received a legal notice 885451645 regarding securities litigation for Leventhal v. Chegg, Inc. et all No. 5:21-cv-09953-PCP (N.D. Cal.). Copy of the notice attached.

Request to exclude me from all litigation.

Thank you,

Juliias Ellis

Case 5:21-cv-09953-PCP

Lilias # 1115

Document 198-1 Filed 04/10/25

25 FEB 2025 PM 4 L

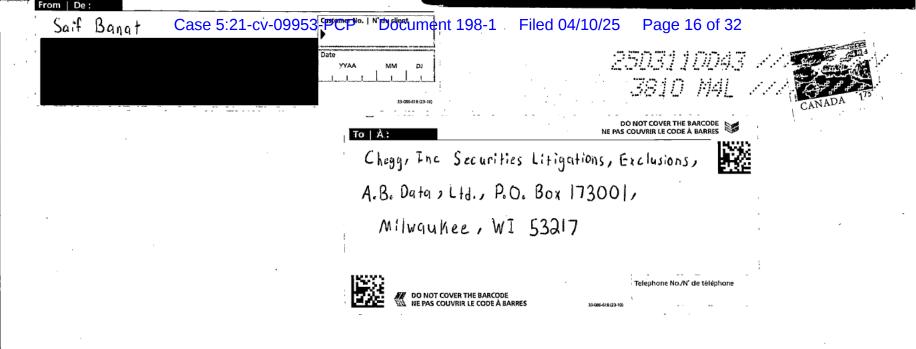
Chegg, Inc.
Securities Litigation, Exclusions
c/o A.B. Data Hd

BO Box 173001
Mil Nankee, W1 53217 Ուկին_{իի}իիրի իիիիիին անդիրերինի գրդններերիիրի ին 53217-801201

Exclusion 3 Received: March 19, 2025

Please exclade me
·
from this Settlement
class.
$C \cdot A \cdot O \cdot A$
- Saif Bangt
C1, b, F1 15 2026
Saturday, Feb, 15,2025
dod!

·



Exclusion 4

Received: March 20, 2025

March 7 2025
To Chigg Inc Securities Litigation, Exclusions
a let to sould be to to to the
I would like to exclude Reis Enterprises Llot.
from the class.
Leweb Elashi
Denote Came
Duector of Reis Enterprises Lld.
,
· · · · · · · · · · · · · · · · · · ·

Lewob Elashi (Reason 10 21 200 85953-PCP Document 198-1 Page 19 of 32 Filed 04/10/25 2503071934 3715 U7B //////// Thegg Ine Accurities Litzalin, Erclusins. C/o A.B. Dala Lld, P. O Box 173001 Milwanker, WI 53217.

USA

_ Որիլիինդանիստիովիրըիսնինութիչիինիրինի

Exclusion 5

Received: March 24, 2025





February 26th, 2025

Exclusions Chegg Securities Litigation % A.B. Data, Ltd. P.O. Box 173001 Milwaukee, WI 53217 USA

To Whom it May Concern,

Subject: Request for Settlement Class Exclusion

I, Mara Pajuelo, request exclusion from the Settlement Class in Leventhal v. Chegg, Inc., et al., Case No. 5:21 -cv-09953 (N.D. Cal.). The number of Chegg shares of common stock that I purchased during the Settlement Class Period (and at any other period for that matter) is one. The date and price of the singular purchase is listed below. I did not sell or acquire any other Chegg stock. Note that the number of shares I held before the beginning of the Settlement Class Period was zero.

Date: February 24th, 2021

Shares Bought: 1 (executed at February 22nd, 2021)

Rate: 1.2824

Charged (\$): 134.30 CAD

Additional attachments are brokerage statements from the month of the purchase as well as the brokerage statements showing that I held the share through the end of the Class Period.

Sincerely,

Mara Pajuelo

Phone: (416) 595-7200 Fax: (416) 595-0400

Owner Account No. Mara Pajuelo

All figures in \$CAD unless otherwise specified

Statement Period 2021-02-01 - 2021-02-28

Tex-Free Savings Account % of Total Book % of Market Value(\$) Value(\$) Value Cash Canadian Equities Foreign Equities Total Portfolio

241 Spadina Avenue, 3rd Floor

Toronto, ON, M5T 2E2

Portfolio Cash Contributions: Last Statement Cash Cash Paid In Deposits Proceeds from Contributions (year to Balance Total Cash Paid In date): Dividends First 60 Days Total Cash Paid Out Rest of Year Closing Cash Balance Interest Other Cash Paid Fees Out Taxes Cost of Investments Withdrawals Other

Symbol Total Segregated Market Market Book Cost (5) Foreign (The conversion rate used to convert your month-end Market Value to CAD is: \$1USD = 1.2758 CAD)	Portfolio Equities	7.	- 47	^		3.0	
	lo-mana-na-na-na-na-na-na-na-na-na-na-na-na-	Symbol	Total	Segregated			
Foreign (The convention rate used to convert your month end Market Value to CAD is: \$1USD = 1.2758 CAD)			_				
Foreign (The conversion rate used to convert your month-end Market Value to CAD is: \$1USD = 1.2758 CAD)							
Foreign (The conversion rate used to convert your month-end Market Value to CAD is: \$1USD = 1.2758 CAD)							
	Foreign	(The conversion	rate used to con	vert your month-end Mark	net Value to CAD is: \$1US	SD = 1.2758 CAD)	

reign	(The conversion rate used to convert your month-end Market Value to CAD is: \$1USD = 1.2758 CAD)					
Cheaa	CHGG	1.0000	1.0000	\$96.53 USD	\$123.15	\$134.30

reorganizations. The book cost has been calculated to the best of our ability based on the information available to us, unless provided by you or your agent. This information should not be used for the purpose of tax reporting as certain events are dependent on individual circumstances and the book value may not reflect all required adjustments.

A -45- 54		ria d	 		***************************************	
Activity	- Current per	and the same of th	 			
Date	Transaction	Description		Charged (\$)	Credit (\$)	Balance (\$)



Regulated by Investment industry Regulatory Organization of Canada

Activity - Current period Balance (\$) Charged (\$) Credit (\$) Description

2/4



1/4

Phone: (416) 595-7200 Fax: (416) 595-0400

All figures in \$CAD unless otherwise specified Statement Period Account No. Owner 2021-03-01 - 2021-03-31 Mara Pajuelo

ORDER EXECUTION ONLY ACCOUNT

Tax-Free Savings Account Market % of Market Book % of Total Book Value(\$) Value Value Value(\$) Cash Canadian Equities Foreign Equities Total Portfolio

Mara Pajuelo

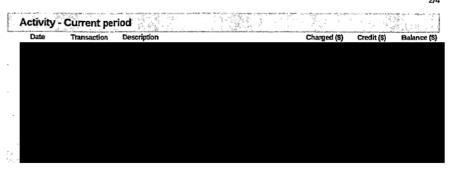
Toronto, CN, M5T 2E2

Portfolio Cash Last Statement Cash Deposits Contributions: Contributions (year to Proceeds from Balance Total Cash Paid In sales date): First 60 Days Total Cash Paid Out Dividends Closing Cash Balance Interest Rest of Year Other Cash Paid Fees Out Taxes Cost of Investments Withdrawals

	Symbol	Total	Segregated	Market	Market	Book
Canadian		Shares Shares		Price (\$)	Value (S)	Cost* (\$)
Foreign	(The conversion	rate used to com	rent your month-end Mari	cet Value to CAD is: \$10	ISD = 1.2607 CAD)	
Chegg	CHGG	1.0000	1.0000	\$85.66 USD	\$107.99	\$134.30

Other









Share Owner

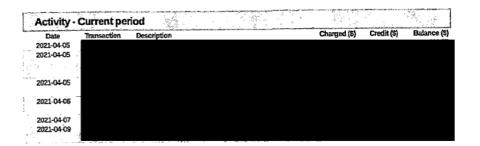
241 Spadina Avenue, 3rd Floor Toronto, ON, M5T 2E2 Phone: (416) 595-7200 Fax: (416) 595-0400 ORDER EXECUTION ONLY ACCOUNT 1/4 All figures in \$CAD unless otherwise specified Account No. Statement Period Mara Pajuelo 2021-04-01 - 2021-04-30

99855 / T	Tax-Free	Savings Accou	nt	
	Market Value(\$)	% of Market Value	Book Value(\$)	% of Total Book Value
Cash Canadian Equities Foreign Equities Total Portfolio				

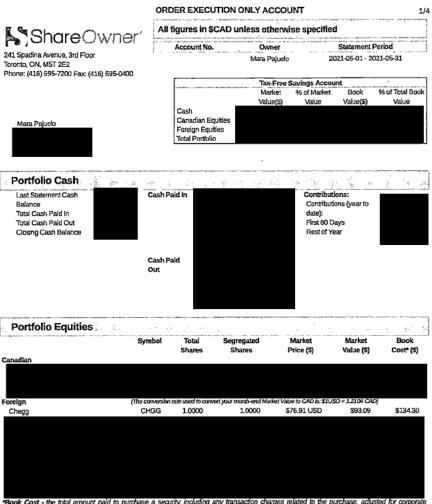
Last Statement Cash Balance	Cash Paid In	Contributions: Contributions (year to
Total Cash Paid In		date): First 60 Days
Total Cash Paid Out Closing Cash Balance		Rest of Year
	Cash Paid Out	

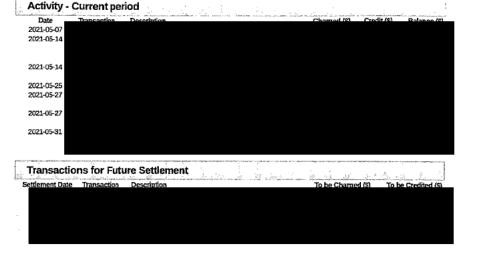
Canadian		Shares	Shares	Price (S)	Market Value (\$)	Book Cost* (\$)
			O.M.C.	1 1.00 (0)	1225 (4)	
Foreign	(The conversion	rate used to com	vert your month-end Mari	net Value to CAD is: \$10	ISD = 1.2330 CAD)	
Chegg	CHGG	1.0000	1.0000	\$90.33 USD		\$134.3

















1/4



All figures in \$CAD unless otherwise specified Account No. Statement Period 2021-06-01 - 2021-06-30 Mara Pajuelo

241 Spadina Avenue, 3rd Floor Toronto, ON, M5T 2E2 Phone: (416) 595-7200 Fax: (416) 595-0400

Tax-Free Savings Account % of Total Book 96 of Market Value(\$) Value Value(\$) Cash Canadian Equities Foreign Equities Total Portfolio

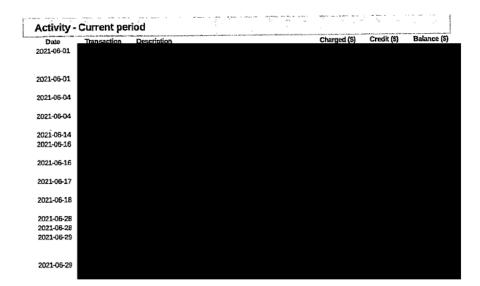
Mara Pajuelo

Portfolio Cash		ر کر ج <u>ہ</u>	4 4 3		à C.
Last Statement Cash Balance Total Cash Paid In Total Cash Paid Out Closing Cash Balance	and.	Cash Paid In	Deposits Proceeds from sales Dividends Interest Other	Contributions: Contributions (year to date): First 60 Days Rest of Year	
		Cash Paid Out	Fees Taxes Cost of Investment Withdrawals Other		

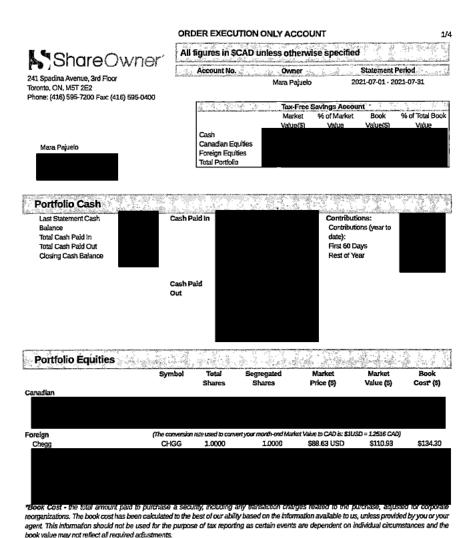
ORDER EXECUTION ONLY ACCOUNT

Symbol	Total Shares	Segregated	Market	Market	
A		Shares	Price (\$)	Value (\$)	Book Cost* (\$)
Canadian				,,,	• • • • • • • • • • • • • • • • • • • •
Foreign (The conversion of	ate used to con.	rert your month-end Mark	et Value to CAD is: \$1U	SD = 1.2432 CAD)	
Chegg CHGG	1.0000	1.0000	\$83.11 USD	\$103.32	\$134.30









Activity - Current period Date Transaction Description Charged (S) Credit (S) Balance (\$) 2021-07-05 2021-07-07 2021-07-07 2021-07-08 2021-07-08 2021-07-08 2021-07-09 2021-07-19 2021-07-19 2021-07-19 10-877A 2021-07-19 2021-07-19 2021-07-19





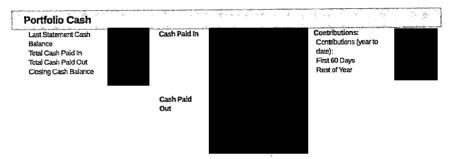


241 Spadina Avenue, 3rd Floor Toronto, ON, M5T 2E2 Phone: (416) 595-7200 Fax: (647) 245-1002

ORDER EXECUTION ONLY ACCOUNT 1/4 All figures in \$CAD unless otherwise specified Statement Period Owner Account No. Mara Pajuelo 2021-08-01 - 2021-08-31

	Tax-Free	Savings Accou	nt	
	Market	% of Market	Book	% of Total Book
	Value(\$)	Value	Value(\$)	Value
Cash				
Canadian Equities				
Foreign Equities				
Total Portfolio				

Mara Pajuelo



Portfolio Equities	v ,s	. 4	T. S		. 500	N - 16-161
	Symbol	Total Shares	Segregated Shares	Market Price (\$)	Market Value (S)	Book Cost* (S)
Canadian		01,000	C 1			
		man used in con	rert your month-end Mari	iet Value to CAD is: \$10	ISD = 1.2653 CAD)	
Foreign	(The conversion					







2021-09-28

2021-09-28

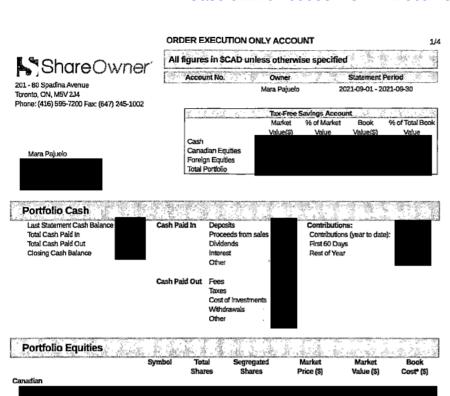
Activity - Current period

Transaction

Description

Charged (S)

Credit (S)



reorganizations. The book cost has been calculated to the best of our ability based on the information available to us, unless provided by you or your agent. This information should not be used for the purpose of tax reporting as certain events are dependent on individual circumstances and the book value may not reflect all required adjustments.

1.0000

CHGG

(The conversion rate used to convert your month-end Market Value to CAD is: \$1USD = 1.2705 CAD)

\$68.02 USD

1.0000

Foreign

Chegg







Book

Coett (\$)

Market



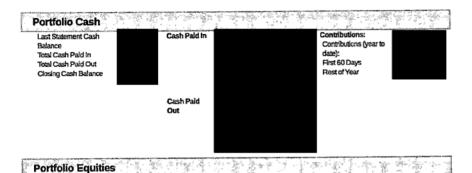
201 - 80 Spadina Avenue Toronto, ON, M5V 2J4 Phone: (416) 595-7200 Fax: (647) 245-1002

Mara Pajuelo

ORDER EXECUTION ONLY ACCOUNT 1/4 All figures in \$CAD unless otherwise specified Account No. Mara Paiuelo 2021-10-01 - 2021-10-31

Factor of the second	Tax-Free	Savings Accou	nt 🔭 🧷	1. 12 OE 194
	Market Value(\$)	% of Market Value	Book Value(\$)	% of Total Book Value
Cash Canadian Equities Foreign Equities Total Portfolio				

Market



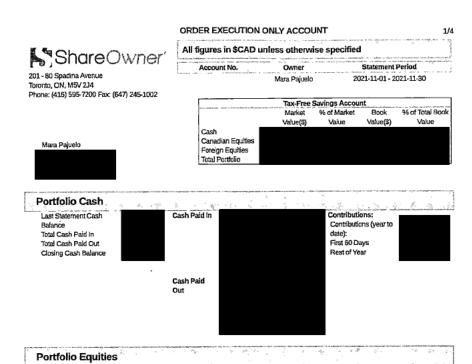
		Snares	Snares	Price (\$)	value (a)	COSt (4)
Canadian						
Foreign	(The conversion	rate used to conve	t your month-end Mar	ket Value to CAD is: \$1U	SD = 1.2412 CAD)	
						\$134.30
Chegg	CHGG	1.0000	1.0000	\$59.44 USD	\$73.78	\$1343 6

Total







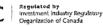


Market Book Symbol Total Segregated Market Shares Price (\$) Value (\$) Cost* (\$) Shares Canadian (The conversion rate used to convert your month-end Market Value to CAD is: \$1USD = 1.2812 CAD) Foreign Chegg CHGG 1.0000 1.0000 \$27.85 USD \$35.68 \$134.30









Case 5:21-cv-09953-PCP Document 198-1 Filed 04/10/25 Page 32 of 32

Chegg Securities Litigation % A.B. Data, Ltd. P.O. Box 173001 Milwaukee, WI 53217 USA

Exclusions

eoso գիհայիթիլմաիիլինիրինիրինինինինինի