

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MYA BATTON, AARON BOLTON,
MICHAEL BRACE, DO YEON KIM,
ANNA JAMES, JAMES MULLIS,
THEODORE BISBICOS, and DANIEL
PARSONS, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

THE NATIONAL ASSOCIATION OF
REALTORS, ANYWHERE REAL ESTATE, INC.
FORMERLY KNOWN AS REALOGY HOLDINGS
CORP., RE/MAX LLC, and KELLER WILLIAMS
REALTY, INC.,

Defendants.

Case No. 1:21-cv-00430 (LAH)

SUPPLEMENTAL DECLARATION OF JULIA WESTPHAL OF A.B. DATA

I, Julia Westphal, declare as follows:

1. I am a Project Manager with A.B. Data, Ltd. (“A.B. Data”). I am fully familiar with the facts contained herein based upon my personal knowledge and, if called as a witness, I could and would testify competently thereto.

2. The Court appointed A.B. Data to serve as Claims Administrator to provide notification and claims administration services in connection with the Keller Williams and RE/MAX Settlements (the “Settlements”) (Docs. 269 ¶ 8, 314 ¶ 8). My previous declaration, the *Declaration of Julia Westphal of A.B. Data in Support of Motion for Final Approval of Settlement*

(Doc. 336-1), described the implementation of the Notice Plan approved by the Court and how it provided notice to Settlement Class Members in this action.

3. I am submitting this Declaration to provide the Court with updated administration information. It is based upon my personal knowledge and upon information provided to me by my associates and A.B. Data staff members.

4. As stated in my previous declaration, A.B. Data's duties in connection with the Settlements include: (a) establishing a toll-free telephone number; (b) establishing a post office box for the receipt of mail; (c) receiving and analyzing the Class List; (d) creating a Settlement Website with online claim filing capabilities; (e) implementing the Notice Plan; (f) preparing the Short-Form Notice and Long-Form Notice; (g) sending the Short-Form Notice via email to Settlement Class Members; (h) receiving and processing mail from the United States Postal Service ("USPS") with forwarding addresses; (i) receiving and processing undeliverable mail, without a forwarding address, from the USPS; (j) receiving and processing Settlement Claim Forms; (k) receiving and processing opt-out requests; and (l) such other tasks as counsel for the Parties or the Court request A.B. Data to perform.

DIRECT NOTICE

5. On April 14, 2026, A.B. Data sent the Short-Form Notice, formatted as an email ("Email Notice"), to 268,860 potential Settlement Class Members on the Class List for whom an email address was available. Of the 268,860 Email Notices that were sent to potential Settlement Class Members, 144,888 (or 54%) were delivered. The remaining emails were undeliverable due to invalid addresses, domain rejections, inactive accounts, or other technical reasons.

6. On June 22, 2026, A.B. Data sent a reminder email notice ("Reminder Email Notice") to the 144,888 potential Settlement Class Members for whom a valid email address was available.

7. On July 20, 2026, A.B. Data sent the final Reminder Email Notice to potential Settlement Class Members for whom a valid email address remained available.

PAID MEDIA

8. From April 14, 2026, through May 29, 2026, digital banner and social media advertising appeared on various websites and social media via Google Display Networks, YouTube, Facebook, Instagram, and other programmatic platforms. Targeted digital and social media advertising was also employed to programmatically reach users such as: homeowners; individuals viewing home improvement or renovation content; and individuals searching for or researching home loans, mortgages, or homeowners insurance. This advertising delivered 225,996,699 gross impressions, exceeding the 200 million gross impression delivery goal.

9. A.B. Data purchased sponsored search listings to appear from April 14, 2026, through May 29, 2026, on Google and/or other search partners. When a person used a specific target phrase and/or keyword in a search engine to search for information, the link to the case-specific website may have appeared near the top of the search result pages.

EARNED MEDIA

10. On April 14, 2026, A.B. Data distributed a news release via *PR Newswire*'s US1 Newswire and shared information about the case with its followers on X.

SUPPLEMENTAL THIRD-PARTY DIRECT NOTICE

11. Additional direct notice, using third-party information, will be utilized to supplement the Court approved Notice Plan, increase awareness about the Settlements and encourage Settlement Class Members to submit timely and valid claims before the August 25, 2026 deadline.

12. A.B. Data acquired a permission-based dataset consisting of approximately 7,497,682 records of recent home purchasers in the affected Class States from a compliant third-party provider.¹ Upon receipt, A.B. Data reviewed, cleansed, and tested the dataset and removed all duplicate records from the Class List.

13. A.B. Data is preparing the Email Notice for the supplemental dataset of recent home purchasers in the affected Class States, and distribution is expected to begin shortly.

WEBSITE AND TOLL-FREE TELEPHONE NUMBER

14. A.B. Data established and continues to maintain the secure, dedicated website for the Settlements: www.homebuyerlitigation.com. As of June 30, 2026, there have been 84,176 unique visitors to the website and 152,471 page views within the website.

15. A.B. Data established and continues to maintain the case-specific toll-free telephone number, 800-329-4562, with an automated interactive voice response (“IVR”) system to answer Settlement Class Member questions and provide additional information. As of June 30, 2026, A.B. Data has received 41 calls to the toll-free telephone number.

CAFA

16. On February 19, 2026, A.B. Data, on behalf of Defendant Keller Williams, provided the notice required under the Class Action Fairness Act, 28 U.S.C. § 1715(b) (“CAFA”). On April 3, 2026, A.B. Data, on behalf of Defendant RE/MAX, LLC, provided the notice required

¹ The provider represents that the email addresses were obtained through consumers’ acceptance of a privacy policy, and its compilation and delivery procedures comply with applicable governing guidelines.

under the Class Action Fairness Act, 28 U.S.C. § 1715(b) (“CAFA”). A.B. Data caused both CAFA Notices to be sent to the Attorneys General of all the States and Territories of the United States and the Attorney General of the United States. The CAFA Notices were sent via each office’s preferred method of delivery, including priority mail and/or email.

OBJECTIONS AND EXCLUSIONS

17. The deadline for Settlement Class Members to object to or opt out of the Settlements was June 23, 2026. To date, A.B. Data has not received any objections or exclusion requests.

CLAIMS ADMINISTRATION

18. A.B. Data is providing claims administration services, including processing each submitted Claim Form, preparing and sending deficiency/eligibility notifications, determining the *pro rata* amount of each claim payment due based on experts’ methodology, and providing payments, via check or electronic payment platform to authorized claimants.

19. Settlement Class Members who wish to be eligible to receive a payment from the Settlement Fund are required to complete and submit a properly executed Claim Form, either by mail or online through the website, no later than the August 25, 2026 deadline.

20. As of July 21, 2026, A.B. Data has received 32,897 Claim Forms, of which all have been submitted through the Settlement Website. A.B. Data has not yet received any paper Claim Forms.

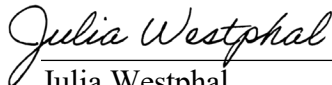
21. A.B. Data, in partnership with Covalynt LLC, is reviewing and processing claims as they are received. However, this process will not be complete until the claim filing deadline has passed and all claim forms have been submitted. A.B. Data will provide the Court an updated report regarding claims administration after the claim filing deadline.

ADMINISTRATION COSTS

22. As of July 21, 2026, A.B. Data has invoiced \$213,592.96 for claims administration services in connection with the Settlements. A.B. Data estimates that the additional cost to complete the administration will be approximately \$739,400.00². This estimate is based on A.B. Data's experience, but the final cost of this administration could change based on the actual circumstances and volumes, or additional out-of-scope work not originally anticipated in the proposal. A.B. Data will continue to strive to keep costs manageable whenever possible and will provide the Court with any motion to approve the disbursement of the Net Settlement Fund in this Action.

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

Executed this 21st day of July 2026.



Julia Westphal

² As part of the enhanced Notice Program, Class Counsel approved the acquisition and deployment of an additional email list at a cost of **\$163,400**, expanding the potential email notice population by up to **7,497,682** additional prospective Settlement Class members.