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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

BRIAN H. ROBB, Individually and on Behalf
of All Others Similarly Situated,

Plaintiffs,

v.

FITBIT INC., JAMES PARK, WILLIAM R.
ZERELLA, ERIC N. FRIEDMAN,
JONATHAN D. CALLAGHAN, STEVEN
MURRAY, CHRISTOPHER PAISLEY,
MORGAN STANLEY & CO. LLC,
DEUTSCHE BANK SECURITIES INC., and
MERRILL LYNCH, PIERCE, FENNER &
SMITH INC.,

Defendants.

No. 3:16-cv-00151-SI

**SUPPLEMENTAL DECLARATION
OF BRIAN MANIGAULT
CONCERNING THE MAILING AND
PUBLICATION OF NOTICE; AND
RECEIPT OF EXCLUSION
REQUESTS, OBJECTIONS, AND
CLAIMS**

Date: April 20, 2018

Time: 10:00 a.m.

Place: Courtroom 1, 17th Floor

Judge: Hon. Susan Illston

1 I, Brian Manigault, declare:

2 1. I am over 21 years of age and am not a party to this action. I have personal
3 knowledge of the facts set forth herein.

4 2. I submit this declaration in order to provide the Court and the parties to the
5 above-captioned litigation with supplemental information regarding the dissemination of notice
6 of the Settlement, as well as the claims, requests for exclusion, and objections received from
7 Settlement Class members.

8 3. I am the Project Manager with Angeion Group (“Angeion”), a nationally-
9 recognized class action administration firm. In connection with the settlement, Angeion was
10 appointed and approved to provide administrative services as part of the settlement
11 administration process in the above-captioned litigation. Our services included the printing and
12 mailing to potential class members of the Notice and Proof of Claim (together, the “Notice
13 Packet”) approved by the Court, processing claims, and tracking exclusion requests.

14 4. As I noted in my March 16, 2018 Declaration (ECF No. 214) (“Manigault
15 Decl.”), as of March 16, 2018, Angeion had mailed a total of 359,136 Notice Packets to
16 potential Settlement Class members or nominees. Manigault Decl. ¶ 8. This figure included 202
17 mailed to individuals and organizations identified on Fitbit’s shareholder transfer records; 3,387
18 mailed to banks, brokerage companies, and other nominee account holders contained in
19 Angeion’s Broker Nominee Database; 152,285 provided to nominee account holders for
20 forwarding to the beneficial owners, and 203,262 mailed directly to beneficial owners at the
21 addresses provided by their nominees. Manigault Decl. ¶¶ 5–8.

22 5. Subsequently, Angeion has continued to provide Notice Packets to nominee
23 account holders upon request and to mail Notice Packets directly to beneficial owners upon
24 receipt of their addresses from nominees. Since March 16, 2018, Angeion has mailed 105 Notice
25 Packets directly to beneficial owners at the addresses provided by their nominees.

26 6. To date, as a result of all of the efforts noted in the previous two paragraphs,
27 Angeion has mailed a total of 359,241 Notice Packets to potential Settlement Class members or
28 nominees.

1 7. Under the Preliminary Approval Order and as set forth in the Notice, objections
2 had to be filed with the Court by April 3, 2018; requests for exclusion had to be submitted to the
3 Settlement Administrator by April 10, 2018; and Proofs of Claim and Release had to be
4 submitted to the Settlement Administrator by April 15, 2018.

5 8. To date, Angeion has received approximately 10,500 claims, of which 7,644
6 have been reviewed and 2,856 still require processing.

7 9. As of April 12, 2018, Angeion has received eleven requests for exclusion.
8 Attached as Exhibit A is a table listing each of the exclusion requests.

9 10. I am aware of the objections filed by Jack McRoberts and Christopher Brown on
10 the Court's docket. *See* Letter from Jack McRoberts (ECF No. 221); Letter from Christopher
11 Brown (ECF No. 222). Other than the objections on the Court's docket, Angeion has not
12 separately received any objections.

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

14
15 Signed this 13th day of April, 2018 at Philadelphia, Pennsylvania.

16
17 
18 BRIAN MANIGAULT

Exhibit A

Name	Location
Paul Edwards	Bayfield, Colorado
Frederick E. Edwards	Bayfield, Colorado
Marzio Giacchetta	Dornach, Switzerland
Peter W. Richards	San Francisco, California
Lorene Carter Ohman	Duncan, South Carolina
Henry M. Gowin	Minneapolis, Minnesota
Lisa Anne Halford	Lenox, Massachusetts
Benjamin J. Schauer	Denmark, Wisconsin
Judy S. Mathus	Lynchburg, Virginia
Albert S. Moy	Warren, Michigan
William J. Krizsan	Twinsburg, Ohio