

EXHIBIT C

COLLECTIVE CLASS REPRESENTATIVE DECLARATIONS IN SUPPORT OF PLAINTIFFS' APPLICATION FOR AN AWARD OF ATTORNEYS' FEES AND CLASS REPRESENTATIVE AWARDS

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In Re: Group Health Plan Litigation

Case No. 23-cv-00267 (JWB/DJF)

**COLLECTIVE CLASS
REPRESENTATIVE
DECLARATIONS IN SUPPORT OF
PLAINTIFFS' MOTION FOR AN
AWARD OF ATTORNEYS' FEES
AND CLASS REPRESENTATIVE
AWARDS**

Class Counsel submits the following attachments in support of Plaintiffs' Motion for an Award of Attorneys' Fees and Service Awards:

1. Declaration of Kelly Vriezen in support of Plaintiffs' Motion for Attorneys' Fees and Class Representative Awards is attached as **Exhibit 1**.
2. Declaration of Sandra Tapp in support of Plaintiffs' Motion for Attorneys' Fees and Class Representative Awards is attached as **Exhibit 2**.
3. Declaration of Kaye Lockrem in support of Plaintiffs' Motion for Attorneys' Fees and Class Representative Awards is attached as **Exhibit 3**.

Dated: May 27, 2025

Respectfully submitted,

s/ Bryan L. Bleichner

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***Counsel for Plaintiffs and the Class
the Class***

Exhibit 1

Figentcwp"qh"Kelly Vriezen

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In Re: Group Health Plan Litigation

Case No. 23-cv-00267 (JWB/DJF)

**DECLARATION OF PLAINTIFF
KELLY VRIEZEN IN SUPPORT OF
MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND SERVICE
AWARD**

I, Kelly Vriezen, state that the following is true and accurate:

1. I am one of the named Plaintiffs in the above-captioned class action lawsuit.

I submit this declaration in support of Plaintiffs' Motion for Attorneys' Fees and Class Representative Service Award, as well as Plaintiffs' forthcoming Motion for Final Approval of Class Action Settlement.

2. I make this declaration based on my personal knowledge, and could and would testify to the truthfulness of the facts herein.

3. I am a patient of Group Health Plan, Inc., the Defendant in this action. Based on my investigation, my medical information was tracked and transmitted via Defendant's surreptitious Facebook tracking pixel. I later initiated this action through my attorneys.

4. I have been in consistent contact with my attorneys in this matter, especially the attorneys at Almeida Law Group LLC and have stayed apprised of this case's progress. My attorneys have been available to answer any questions I have had as this case has progressed. I have had numerous meetings and phone calls with my attorneys about the progress of the case, the issues, and the information needed from me. Throughout this case,

I estimate spending approximately 30 hours responding to phone calls and emails and meeting with my attorneys.

5. I have remained engaged with my attorneys as this case progressed, including as we explored settlement with Defendant. I was available to review settlement offers and submit responses during the settlement conference with United States Magistrate Judge Dulce W. Foster, which ultimately resulted in the settlement before this court on final approval.

6. I have committed many hours to pursuing this matter on my own behalf and on behalf of the class without any promise or guarantee of compensation. This includes time spent researching the data breach, communicating with my counsel, reviewing and approving the allegations in the complaint and consolidated class action complaint, responding to and reviewing discovery responses, providing information in response to requests by Defendant, reviewing and approving the terms of the proposed settlement, and reviewing the preliminary approval order. I estimate spending approximately 38 hours on these necessary tasks.

7. I understand that the Settlement benefits afforded to me and the approximately 983,000 other similarly situated individuals includes a \$6,000,000 settlement fund that will be used to make cash payments to me and other class members submitting valid claims after the reduction of my counsel's attorneys' fees, any settlement administration costs, and the potential class representative service awards. I also understand that Defendant has agreed to implement and maintain important business

practice changes that will preclude Defendant from re-installing the surreptitious Facebook tracking pixel.

8. I believe that the Settlement benefits are a great result for me and my fellow Class Members. I strongly support this Settlement and the benefits recovered and believe they are more than reasonable.

9. I have reviewed Class Counsel's request for attorneys' fees of 1/3 the \$6,000,000 common fund (\$2,000,000) and believe such fees and expenses are fair and adequate under the circumstances of this case.

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

/s/ *Kelly K. Vriezen*

Kelly Vriezen, Class Representative



Audit trail

Title	Group Health - Class Rep - Kelly Vriezen Declaration.pdf
File name	Group%20Health%20...20Declaration.pdf
Document ID	de51d2adb2facc3daf5055983b11bd4d8d55cb69
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Document History



SENT

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Sent for signature to Kelly Vriezen (kvriezen@gmail.com)
from elena@almeidalawgroup.com
IP: 74.109.187.166



VIEWED

05 / 27 / 2025

02:04:11 UTC

Viewed by Kelly Vriezen (kvriezen@gmail.com)
IP: 65.73.58.167



SIGNED

05 / 27 / 2025

02:11:43 UTC

Signed by Kelly Vriezen (kvriezen@gmail.com)
IP: 65.73.58.167



COMPLETED

05 / 27 / 2025

02:11:43 UTC

The document has been completed.

Exhibit 2

F gencv kq "qh Sandra Tapp

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In Re: Group Health Plan Litigation

Case No. 23-cv-00267 (JWB/DJF)

**DECLARATION OF PLAINTIFF
SANDRA TAPP IN SUPPORT OF
MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND SERVICE
AWARD**

I, Sandra Tapp, state that the following is true and accurate:

1. I am one of the named Plaintiffs in the above-captioned class action lawsuit.

I submit this declaration in support of Plaintiffs' Motion for Attorneys' Fees and Class Representative Service Award, as well as Plaintiffs' forthcoming Motion for Final Approval of Class Action Settlement.

2. I make this declaration based on my personal knowledge, and could and would testify to the truthfulness of the facts herein.

3. I am a patient of Group Health Plan, Inc., the Defendant in this action. Based on my investigation, my medical information was tracked and transmitted via Defendant's surreptitious Facebook tracking pixel. I later initiated this action through my attorneys.

4. I have been in consistent contact with my attorneys in this matter, especially the attorneys at Zimmerman Reed LLP and have stayed apprised of this case's progress. My attorneys have been available to answer any questions I have had as this case has progressed. I have had numerous meetings and phone calls with my attorneys about the progress of the case, the issues, and the information needed from me. Throughout this case,

I estimate spending approximately 8 hours responding to phone calls and emails and meeting with my attorneys.

5. I have remained engaged with my attorneys as this case progressed, including as we explored settlement with Defendant. I was available to review settlement offers and submit responses during the settlement conference with United States Magistrate Judge Dulce W. Foster, which ultimately resulted in the settlement before this court on final approval.

6. I have committed many hours to pursuing this matter on my own behalf and on behalf of the class without any promise or guarantee of compensation. This includes time spent researching the data breach, communicating with my counsel, reviewing and approving the allegations in the complaint and consolidated class action complaint, responding to and reviewing discovery responses, providing information in response to requests by Defendant, reviewing and approving the terms of the proposed settlement, and reviewing the preliminary approval order. I estimate spending approximately 10 hours on these necessary tasks.

7. I understand that the Settlement benefits afforded to me and the approximately 983,000 other similarly situated individuals includes a \$6,000,000 settlement fund that will be used to make cash payments to me and other class members submitting valid claims after the reduction of my counsel's attorneys' fees, any settlement administration costs, and the potential class representative service awards. I also understand that Defendant has agreed to implement and maintain important business

practice changes that will preclude Defendant from re-installing the surreptitious Facebook tracking pixel.

8. I believe that the Settlement benefits are a great result for me and my fellow Class Members. I strongly support this Settlement and the benefits recovered and believe they are more than reasonable.

9. I have reviewed Class Counsel's request for attorneys' fees of 1/3 the \$6,000,000 common fund (\$2,000,000) and believe such fees and expenses are fair and adequate under the circumstances of this case.

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

Dated: 05/22/2025



Sandra Tapp, Class Representative



SIGNATURE CERTIFICATE



REFERENCE NUMBER

22F97383-C195-4A15-86FB-2639034E2C04

TRANSACTION DETAILS

Reference Number

22F97383-C195-4A15-86FB-2639034E2C04

Transaction Type

Template Signer Link

Sent At

05/22/2025 14:01 EDT

Executed At

05/22/2025 14:06 EDT

Identity Method

none

Distribution Method

manual

Signed Checksum

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Signer Sequencing

Disabled

Document Passcode

Disabled

DOCUMENT DETAILS

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SIGNERS

SIGNER	E-SIGNATURE	EVENTS
Name Sandra Tapp	Status signed	Viewed At 05/22/2025 14:01 EDT
Email sagguns30@gmail.com	Multi-factor Digital Fingerprint Checksum 2f6e299949d47cf6247ee134b9ff5f40fba2072469f4f13610939ad7c0d3159f	Identity Authenticated At N/A
Components 2	IP Address 173.25.30.30	Signed At 05/22/2025 14:06 EDT
	Device Chrome Mobile via Android	
	Drawn Signature 	
	Signature Reference ID A87B1F17	
	Signature Biometric Count 6	

AUDITS

TIMESTAMP	AUDIT
05/22/2025 14:01 EDT	Signer viewed the document on Chrome Mobile via Android from 173.25.30.30.
05/22/2025 14:06 EDT	Sandra Tapp (sagguns30@gmail.com) signed the document on Chrome Mobile via Android from 173.25.30.30.

Exhibit'3<"
F gercvkcqp"qh"Kaye Lockrem

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In Re: Group Health Plan Litigation

Case No. 23-cv-00267 (JWB/DJF)

**DECLARATION OF PLAINTIFF
KAYE LOCKREM IN SUPPORT OF
MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND SERVICE
AWARD**

I, Kaye Lockrem, state that the following is true and accurate:

1. I am one of the named Plaintiffs in the above-captioned class action lawsuit.

I submit this declaration in support of Plaintiffs' Motion for Attorneys' Fees and Class Representative Service Award, as well as Plaintiffs' forthcoming Motion for Final Approval of Class Action Settlement.

2. I make this declaration based on my personal knowledge, and could and would testify to the truthfulness of the facts herein.

3. I am a patient of Group Health Plan, Inc., the Defendant in this action. Based on my investigation, my medical information was tracked and transmitted via Defendant's surreptitious Facebook tracking pixel. I later initiated this action through my attorneys.

4. I have been in consistent contact with my attorneys in this matter, especially the attorneys at Barrack Rodos & Bacine and the Emerson Firm, LLP and have stayed apprised of this case's progress. My attorneys have been available to answer any questions I have had as this case has progressed. I have had numerous meetings and phone calls with my attorneys about the progress of the case, the issues, and the information needed from

me. Throughout this case, I estimate spending approximately 15 hours responding to phone calls and emails and meeting with my attorneys.

5. I have remained engaged with my attorneys as this case progressed, including as we explored settlement with Defendant. I was available to review settlement offers and submit responses during the settlement conference with United States Magistrate Judge Dulce W. Foster, which ultimately resulted in the settlement before this court on final approval.

6. I have committed many hours to pursuing this matter on my own behalf and on behalf of the class without any promise or guarantee of compensation. This includes time spent researching the data breach, communicating with my counsel, reviewing and approving the allegations in the complaint and consolidated class action complaint, responding to and reviewing discovery responses, providing information in response to requests by Defendant, reviewing and approving the terms of the proposed settlement, and reviewing the preliminary approval order. I estimate spending approximately 15 hours on these necessary tasks.

7. I understand that the Settlement benefits afforded to me and the approximately 983,000 other similarly situated individuals includes a \$6,000,000 settlement fund that will be used to make cash payments to me and other class members submitting valid claims after the reduction of my counsel's attorneys' fees, any settlement administration costs, and the potential class representative service awards. I also understand that Defendant has agreed to implement and maintain important business

practice changes that will preclude Defendant from re-installing the surreptitious Facebook tracking pixel.

8. I believe that the Settlement benefits are a great result for me and my fellow Class Members. I strongly support this Settlement and the benefits recovered and believe they are more than reasonable.

9. I have reviewed Class Counsel's request for attorneys' fees of 1/3 the \$6,000,000 common fund (\$2,000,000) and believe such fees and expenses are fair and adequate under the circumstances of this case.

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

Date: 05/22/2025

A handwritten signature in black ink, appearing to read 'Kaye Lockrem', is written above a horizontal line.

Kaye Lockrem, Class Representative