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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 OAKLAND DIVISION

15 VISWANATH V. SHANKAR, Individually) Case No. 4:14-cv-01680-PJH
and on Behalf of All Others Similarly Situated,)
16) CLASS ACTION
Plaintiff,)
17)
vs.) SUPPLEMENTAL DECLARATION OF
18) CAROLE K. SYLVESTER REGARDING
IMPERVA, INC., et al.,) NOTICE DISSEMINATION, REQUESTS
19) FOR EXCLUSION RECEIVED TO DATE,
Defendants.) AND INTERIM CLAIMS PROCESSING
20)
DATE: January 31, 2018
TIME: 9:00 a.m.
CTRM: 3
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1 I, CAROLE K. SYLVESTER, declare:

2 1. I am employed as the Director of Notice by Gilardi & Co. LLC (“Gilardi”), located at
3 3301 Kerner Blvd., San Rafael, California. Pursuant to its October 11, 2017 Order Preliminarily
4 Approving Settlement and Providing for Notice (the “Notice Order”), the Court appointed Gilardi to
5 supervise and administer the notice procedure in connection with the proposed settlement of the
6 above-captioned litigation (the “Litigation”). I oversaw the notice services that Gilardi provided in
7 accordance with the Notice Order.
8

9 2. I submit this supplemental declaration in order to provide the Court and the parties to
10 the Litigation with updated information regarding: (i) the mailing of the Court-approved Notice of
11 Pendency and Proposed Settlement of Class Action (the “Notice”) and the Proof of Claim and
12 Release (the “Proof of Claim”) (collectively, the “Notice Package”), (ii) the receipt of requests for
13 exclusion, and (iii) interim claims processing.
14

15 3. I am over 21 years of age and am not a party to this Litigation. I have personal
16 knowledge of the facts set forth herein and, if called as a witness, could and would testify
17 competently thereto.

18 4. On December 20, 2017, I executed my original declaration, the Declaration of Carole
19 K. Sylvester Regarding Notice Dissemination, Publication, Requests for Exclusion Received to Date,
20 Interim Claims Processing, and Estimate of Administration Fees and Expenses (“Initial Mailing
21 Declaration”), which was filed the same day (ECF No. 154), detailing, among other things, the initial
22 mailing of the Notice Package, the receipt of requests for exclusion received as of December 20,
23 2017, and interim claims processing.
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1 **UPDATE ON DISSEMINATION OF THE NOTICE PACKAGE**

2 5. As more fully stated in my Initial Mailing Declaration, as of December 20, 2017,
3 Gilardi mailed a total of 13,058 Notice Packages to potential Class Members and nominees. Initial
4 Mailing Declaration, ¶11.

5 6. During the time period from December 20, 2017, through the date of this declaration,
6 Gilardi has caused an additional 2,199 Notice Packages to be mailed in response to correspondence
7 received from potential Class Members and nominees.

8 7. Therefore, as of the date of this declaration, Gilardi has mailed a total of 15,257
9 Notice Packages to potential Class Members and nominees.

10 **REQUESTS FOR EXCLUSION RECEIVED TO DATE**

11 8. As stated in my Initial Mailing Declaration, the Notice informed potential Class
12 Members that written requests for exclusion from the Class must be mailed to Gilardi, such that the
13 request is received no later than January 3, 2018. As reported in my Initial Mailing Declaration, as
14 of December 20, 2017, Gilardi had not received any requests for exclusion.

15 9. As of January 17, 2018, Gilardi has not received any requests for exclusion.

16 **INTERIM CLAIMS PROCESSING**


17 10. As stated in my Initial Mailing Declaration, the Notice informs potential Class
18 Members that in order to be eligible to receive a payment from the settlement they must complete
19 and submit a Proof of Claim, to be postmarked or submitted online no later than January 22, 2018.

20 11. As of December 20, 2017, Gilardi had received and partially processed a total of 898
21 Proofs of Claim. Initial Mailing Declaration, ¶18.

22 12. Since December 20, 2017, Gilardi has received and partially processed an additional
23 1,755 Proofs of Claim. Therefore, the total number of Proofs of Claim received and partially
24 processed to date is 2,653.

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I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 17th day of January, 2018, at San Rafael, California.


CAROLE K. SYLVESTER

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CERTIFICATE OF SERVICE

I hereby certify that on January 17, 2018, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 17, 2018.

s/ Douglas R. Britton
DOUGLAS R. BRITTON

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Mailing Information for a Case 4:14-cv-01680-PJH Shankar v. Imperva, Inc. et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)