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JS-6

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION**

**IN RE EXPERIAN DATA BREACH
LITIGATION**

Case No. 8:15-cv-01592 AG (DFMx)
Hon. Andrew J. Guilford
FINAL JUDGMENT

FINAL JUDGMENT

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3 1. This Judgment incorporates the definitions in the Settlement Agreement
4 and Release entered in this action (“Settlement,” Dkt. 285) and follows the Court’s
5 Order granting final approval to that Settlement (“Final Approval Order,” Dkt. 322).

6 2. All Parties to this Action, and all Settlement Class Members, are bound
7 by the Settlement and this Judgment. Excluded Persons identified in Exhibit 1 are
8 no longer parties to this Action, are not members of the Settlement Class, and are not
9 bound by the Settlement or this Judgment.

10 3. Judgment shall be, and hereby is, entered dismissing the Action with
11 prejudice, on the merits, without costs to any party except as provided in the Final
12 Approval Order.

13 4. The Class Representatives,¹ all Settlement Class Members, and each of
14 their respective spouses, children, heirs, associates, co-owners, attorneys, agents,
15 administrators, executors, devisees, predecessors, successors, assignees,
16 representatives of any kind, shareholders, partners, directors, employees or affiliates
17 (collectively, “Releasing Parties”), have released the Defendants and each of the
18 Released Parties² from any and all claims or causes of action of every kind and

19
20 ¹ Class Representatives include Stephen Allen, Richard Parks, Ryan Hamre, Joshua
21 Gonzales, Gwendolyn Crump, Elleen Brazzle, Melissa Merry, Francisco Ojeda, Nora
22 Bohannon, Gregory and Kashia Johnson, David Ciano, Bradford Daghita, Alison
23 Cochran, Alice Dunscomb, Samantha Manganaris, Veronica Gillotte, David Brown,
24 Stuart Zimmelman, Chris Shearer, Christiaan Mealey, Gregory Hertik, Allan
25 Sommercorn, Kamil Kuklinski, Charles Yoo, Sergey Barbashov, Kathleen Alcorn,
Mary Roberts, Tony George, Ryan Heitz, Gerardus Jansen, Lorenzo Jackson, Eban
Liebig, Angelia Fennern, Charles Sallade, Cregan Smith, Giovanni Williams, Dipak
Bhuta, Joseph Zubrzycki, Lucio Hernandez, Shivan Bassaw, Jennifer Looney, Darius
Clark, Hunter Graham, Philip Popiel, John Reiser, Jennifer Brandabur, Perry Heath,
David Lumb, Martha Cebrian-Vega, Mark and Daisy Hodson, Amjed Ababseh,
Martha Schroeder, Jason Shafer, Nathaniel Apan, and Jeffrey Gutschmidt.

26 ² As defined in the Settlement, “Released Parties” includes Defendants Experian
27 Information Solutions, Inc. and Experian Holdings, Inc., and their respective
28 predecessors, successors, assigns, parents, subsidiaries, divisions, affiliates,
departments, and any and all of their past, present, and future officers, directors,
employees, stockholders, partners, servants, agents, successors, attorneys,

1 description arising out of or related to the Data Breach, including any causes of action
2 in law, claims in equity, complaints, suits or petitions, and any allegations of
3 wrongdoing, demands for legal, equitable or administrative relief (including, but not
4 limited to, any claims for injunction, rescission, reformation, restitution,
5 disgorgement, constructive trust, declaratory relief, compensatory damages,
6 consequential damages, penalties, exemplary damages, punitive damages, attorneys’
7 fees, costs, interest or expenses) that the Releasing Parties had or have (including,
8 but not limited to, assigned claims and any and all “Unknown Claims” as defined
9 below) that have been or could have been asserted in the Action or in any other action
10 or proceeding before any court, arbitrator(s), tribunal or administrative body
11 (including, but not limited to, any state, local or federal regulatory body), regardless
12 of whether the claims or causes of action are based on federal, state, or local law,
13 statute, ordinance, regulation, contract, common law, or any other source, and
14 regardless of whether they are known or unknown, foreseen or unforeseen, suspected
15 or unsuspected, or fixed or contingent (“Released Claims”). “Unknown Claims”
16 means claims that could have been raised in the Action and that Plaintiffs, any
17 member of the Settlement Class or any Releasing Party, do not know or suspect to
18 exist, which, if known by him, her or it, might affect his, her or its agreement to
19 release the Released Parties or the Released Claims or might affect his, her or its
20 decision to agree, object or not to object to the Settlement. Upon the Effective Date,
21 Plaintiffs, the Settlement Class, and any Releasing Party shall be deemed to have,
22 and shall have, expressly waived and relinquished, to the fullest extent permitted by
23 law, the provisions, rights and benefits of Section 1542 of the California Civil Code.


24 5. The Class Representatives and all Settlement Class Members are hereby
25 barred and permanently enjoined from instituting, asserting or prosecuting any or all
26 of the Released Claims against any of the Released Parties.

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28 representatives, insurers, reinsurers, subrogees, and assigns of any of the foregoing,
as well as Plaintiffs and Class Counsel.

1 6. For the reasons set forth in the Final Approval Order, Class Counsel are
2 awarded attorneys' fees in the amount of \$10.5 million, and reimbursement of
3 Litigation Costs in the amount of \$152,854.28, such amounts to be paid from out of
4 the Settlement Fund in accordance with the terms of the Settlement. Of the
5 Settlement Fund, \$2,500 may be paid to each of the Class Representatives as a
6 Service Award.

7 7. The Court hereby retains and reserves jurisdiction over:
8 (a) implementation of this Settlement and any distributions from the Settlement
9 Fund; (b) the Action, until the Effective Date and until each and every act agreed to
10 be performed by the Parties shall have been performed pursuant to the terms and
11 conditions of the Settlement Agreement, including the exhibits appended thereto; and
12 (c) all Parties, for the purpose of enforcing and administering the Settlement
13 Agreement and the Settlement.

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16 Date: May 29, 2019

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19 Andrew J. Guilford
20 United States District Judge
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