

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

In re: Target Corporation Customer Data  
Security Breach Litigation

This Document Relates to:  
All Consumer Cases

MDL No. 14-2522

**DECLARATION OF AMY L. LAKE ON  
PARTIAL COSTS OF THE NOTICE  
PLAN**

I, Amy L. Lake, being of lawful age and duly sworn, declare:

1. I am a Director of Client Services for Rust Consulting, Inc. (“Rust Consulting”), which serves as the class action administrator for the settlement of the above-captioned action (“Settlement”). I am responsible for supervising the class action administration services provided by Rust Consulting in connection with the Settlement. I have personal knowledge of the facts set forth below.

2. Rust Consulting specializes in class action notification and claims administration. Rust Consulting has provided claims administration services for class actions containing up to seven million class members in cases involving consumers, pension benefits, securities, product liability, insurance, antitrust, fraud, property, employment, discrimination, bankruptcy and other types of class action cases. We regularly provide large-scale notification, claim form request processing, claims validation and processing, settlement benefits distribution, and claims administration services. Rust Consulting has provided claims administration services for more than 4,500 class action settlements and distributed billions of dollars in settlement assets. Rust Consulting also has a subsidiary, Kinsella Media, LLC, that specializes in the design and implementation of class notice programs. Rust Consulting and Kinsella Media frequently work

together, as they have in this case, to provide complete class action administration services.

3. Rust Consulting was engaged as Settlement Administrator to, among other things, (a) disseminate the E-mail Notice and Postcard Notice; (b) develop an on-line Claim submission tool accessible through the website; (c) rent a post office box for receipt of undeliverable and forwarding Mailed Notices, Claim Forms, Exclusion letters, and other communications; (d) establish a website address, [www.TargetBreachSettlement.com](http://www.TargetBreachSettlement.com), to host the Settlement Website for the on-line Claim submission page, publishing the Settlement Agreement, Claim Form and Long Form Notice and for providing information to putative Class Members; and (e) provide a toll-free number with both a pre-recorded message and customer service representatives to answer questions about the Settlement.

4. On March 19, 2015, the Court approved the proposed Notice Program. This declaration will describe the incurred and estimated future costs of the Direct Notice portion of the Notice Program. These costs are separate from and in addition to the total cost of \$470,162.71 associated with the paid and earned media components of the Notice Program, including published advertisements, Internet advertising and a national press release, which are described in the Declaration of Shannon R. Wheatman, Ph.D. On Partial Costs of the Notice Plan.

#### **SETTLEMENT ADMINISTRATION COST**

5. As of July 7, 2015, Rust Consulting has invoiced a total of \$3,970,653.13 in fees and costs, which includes the costs associated with sending the E-mail Notice and Postcard Notice, setting up the website with the ability to submit a claim form electronically, and establishing the toll-free number with customer service support as well as the project management and technical consulting associated with the project. Future costs are estimated to be approximately \$2,130,000 for an estimated total of \$6,100,654.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Minneapolis, Minnesota, this 8th day of July 2015.

Handwritten signature of Amy L. Lake in cursive script.

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Amy L. Lake