

1 Joshua P. Davis, SBN 193254
jdavis@bm.net
2 BERGER MONTAGUE PC
505 Montgomery Street, Suite 625
3 San Francisco, CA 94111
T. 415.689.9292; F. 215.875.4604

4 E. Michelle Drake, *pro hac vice*
Joseph C. Hashmall, *pro hac vice*
5 BERGER MONTAGUE PC
1229 Tyler Street NE, Suite 205
6 Minneapolis, MN 55413
T. (612) 594-5999; F. (612) 584-4470
7 emdrake@bm.net; jhashmall@bm.net

8 *Attorneys for Plaintiffs*

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF SAN MATEO**
11 **UNLIMITED CIVIL**

12 DAVID WALKER, MELISSA CLARK, and
13 BENJAMIN WILSON, individually and as
representatives of the Class,

14 Plaintiffs,

15 vs.

16 INFLECTION RISK SOLUTIONS, LLC,

17 Defendant.

Case No. 22-CIV-02954

**SUPPLEMENTAL DECLARATION OF
JOSEPH C. HASHMALL IN SUPPORT OF
MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

Assigned for All Purposes to Hon. Don R.
Franchi

Date: August 18, 2025

Time: 3:00 p.m.

Department: 15

19
20
21 I, Joseph C. Hashmall, declare as follows:

22 1. I am one of Class Counsel in the above-captioned matter.

23 2. I submit this Supplemental Declaration in support of Plaintiffs' Motion for Final
24 Approval of Class Action Settlement.

25 3. Class Counsel have completed the SOR Reports claims review and are providing
26 updated, final, claims information to the Court:

27 Total SOR Claims Submitted: 2,196
28

1 Withdrawn Claims: 23

2 Invalid Claims: 1,827

3 **Valid Claims: 346**

4 4. Defendant's Counsel have had the opportunity to review Class Counsel's
5 determinations and took no issue with them.

6 5. The claims period has also closed for the Name & DOB Group, and as attested to by
7 the Settlement Administrator in the May 27, 2025 Declaration, there were 200 total claims received
8 for that Group, 189 of which were determined to be valid. (Admin. Decl. ¶ 9.)

9 6. These final claims numbers result in the following estimated net per class member
10 payments:

11 Per Valid SOR Reports Group Claimant: \$1,320

12 Per Valid Name & DOB Group Claimant: \$1,320

13 Per Successful Disputes Group Class Member: \$1,500

14 I declare under penalty of perjury under the laws of the State of California that the
15 foregoing is true and correct.

16 Executed on the 9th day of July, 2025, at Minneapolis, Minnesota.

17 /s/Joseph C. Hashmall
18 Joseph C. Hashmall