

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BUTTE DIVISION**

IN RE: SNOWFLAKE, INC., DATA
SECURITY BREACH LITIGATION

This Document Relates only to
Defendant: THE NEIMAN MARCUS
GROUP, LLC

CASE No.: 2:24-MD-3126-BMM

**SUPPLEMENTAL DECLARATION OF CAMERON R. AZARI, ESQ.
REGARDING IMPLEMENTATION AND ADEQUACY OF NOTICE
PROGRAM AND CLAIM PROCESS**

I, Cameron R. Azari, Esq., hereby declare and state as follows:

1. My name is Cameron R. Azari, Esq. I have personal knowledge of the matters set forth herein, and I believe them to be true and correct.

2. I am a nationally recognized expert in the field of legal notice and have served as an expert in hundreds of federal and state cases involving class action notice plans.

3. I am a Senior Vice President of Epiq Class Action & Claims Solutions, Inc. (“Epiq”) and the Managing Director of Epiq Legal Noticing (aka Hilsoft Notifications), a business unit of Epiq that specializes in designing, developing, analyzing, and implementing large-scale, un-biased, legal notification plans. I previously filed declarations in this matter related to Epiq’s administration of the Settlement with defendant Brightline Inc.

4. The facts in this declaration are based on my personal knowledge, as well as information provided to me by my colleagues in the ordinary course of my business at Epiq and Epiq Legal Noticing (hereinafter “Epiq”).

OVERVIEW

5. This declaration describes the updated settlement administration statistics following the successful implementation of the Settlement Notice Program (“Notice Program”) and Notices (the “Notice” or “Notices”) for the Action against Defendant, The Neiman Marcus Group LLC, in *In Re: Snowflake, Inc., Data Security Breach Litigation*, Case No. 2:24-MD-3126, pending in the United States District Court for the District of Montana. Previously, I executed my Declaration of Cameron R. Azari, Esq. Regarding Implementation and Adequacy of Notice Program (“Implementation Declaration”) on September 8, 2025, which described the successful implementation of the Notice Program, detailed Epiq’s class action notice experience, and attached Epiq’s *curriculum vitae*. I also provided my educational and professional experience relating to class actions and my ability to render opinions on overall adequacy of notice plans.

6. As detailed in my Implementation Declaration, on September 8, 2025, Epiq commenced sending 13,684,927 Email Notices to 13,672,053 identified Settlement Class members for whom a valid email address was available. Some Settlement Class members had two or more valid email addresses and were sent an

Email Notice to each valid email address, resulting in a larger number of Email Notices sent than the number of Settlement Class members with a valid email address.

7. As detailed in my Implementation Declaration, a Long Form Notice and Claim Form (“Claim Package”) were mailed to all persons who requested one via the toll-free telephone number or other means. As of October 15, 2025, Epiq mailed 68 Claim Packages pursuant to such requests.

Individual Notice Results

8. As of October 15, 2025, an Email Notice was delivered to 13,100,619 of the 16,147,008 unique, identified Settlement Class members. This means the individual notice efforts reached approximately 81.1% of the identified Settlement Class sent individual notice.

Settlement Website

9. The Settlement Website (www.NMGsettlement.com) continues to be available 24 hours per day, 7 days per week. Relevant documents, including the Settlement Agreement, Amended Preliminary Approval Order, Long Form Notice, Claim Form, Motion for Final Approval and Application for Attorneys’ Fees, Costs, and Service Awards, and other case-related documents are posted on the Settlement Website. In addition, the Settlement Website includes relevant dates, answers to frequently asked questions (“FAQs”), instructions for how Settlement

Class members could opt-out (request exclusion) from or object to the Settlement prior to the deadlines, instructions for submitting a Claim Form, contact information for the Settlement Administrator, and how to obtain other case-related information. The Settlement Website also provided the ability for Settlement Class Members to submit an online Claim Form prior to the deadline. As of October 15, 2025, there have been 226,699 unique visitor sessions to the Settlement Website, and 833,824 web pages have been presented.

Toll-Free Telephone Number and Other Contact Information

10. The toll-free telephone number (1-855-338-2018) continues to be available for the Settlement. Callers are able to hear an introductory message and have the option to learn more about the Settlement in the form of recorded answers to FAQs. This automated telephone system is available 24 hours per day, 7 days per week. As of October 15, 2025, there have been 1,934 calls to the toll-free telephone number representing 5,721 minutes of use.

11. A postal mailing address and email address were established and continue to be available to allow Settlement Class members the opportunity to request additional information or ask questions.

Opt-Out Requests and Objections

12. The Opt-Out and Objection Periods for the Settlement ended on September 23, 2025. As of October 15, 2025, Epiq has received 51 opt-out

requests. As of October 15, 2025, Epiq is aware that one Settlement Class Member purports to objection to the Settlement. That purported objection is redacted and included as **Attachment 1**. The objection is procedurally deficient and otherwise unrelated to notice or settlement administration. The Exclusion Report is included as **Attachment 2**.

Claim Submission & Distribution

13. The Notices provided a detailed summary of the relevant information about the Settlement, including the Settlement Website address and how Settlement Class Members could submit a Claim Form online or by mail prior to the Claim Form Deadline. With any method of submitting a Claim Form, Settlement Class Members were given the option of receiving a digital payment or a traditional paper check. Epiq worked with counsel for the parties to select an appropriate menu of payment options. The type of digital payment selected does not impact Epiq's compensation for its work as the Settlement Administrator, and no digital option is discouraged relative to other options.

14. The deadline for Settlement Class Members to file a Claim Form was October 8, 2025. As of October 15, 2025, Epiq has received 56,759 Claim Forms (56,419 online and 340 paper). Since the October 8, 2025, Claim Form Deadline has just recently passed, these numbers are preliminary and are subject to change. As standard practice, Epiq is in the process of conducting a complete quality

control review of Claim Forms received. There is a likelihood that after detailed review, the total number of Claim Forms received will change due to duplicate and denied Claim Forms.

CONCLUSION

15. In class action notice planning, execution, and analysis, we are guided by due process considerations under the United States Constitution, by federal and local rules and statutes, and further by case law pertaining to notice. This framework directs that the notice plan be designed to reach the greatest practicable number of potential class members and, in a settlement class action notice situation such as this, that the notice or notice plan itself not limit knowledge of the availability of benefits—nor the ability to exercise other options—to class members in any way. All of these requirements were met in this case.

16. The Notice Program included individual direct notice via email to identified Settlement Class members. The Notice Program individual notice efforts reached approximately 81.1% of the identified Settlement Class sent individual notice. The Publication Notice (digital and social media notice), Settlement Website, and toll-free number extended the reach to greater than 85% of the total Class.

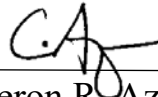
17. The Notice Program provided the best notice practicable under the circumstances of this case, conformed to all aspects of Federal Rules of Civil

Procedure, Rule 23 regarding notice, comported with the guidance for effective notice articulated in the *Manual for Complex Litigation* 4th Ed. and FJC guidance, and satisfied the requirements of due process, including its “desire to actually inform” requirement.

18. The Notice Program schedule afforded sufficient time to provide full and proper notice to Settlement Class members before the end of the Opt-Out Period and Objection Period.

I declare under penalty of perjury that the foregoing is true and correct.

Executed October 16, 2025.



Cameron R. Azari, Esq.

Attachment 1

BRUCE ISACSON

September 9, 2025

The Honorable Brian Morris
United States District Court
District of Montana
Paul G. Hatfield Courthouse
901 Front Street, Suite 2100
Helena, MT 59626

RE: Objection to Class Action Settlement – Neiman Marcus Data Breach (Case No. 2:24-MD-3126-BMM)


Dear Judge Morris,

Enclosed please find my formal letter reaffirming and expanding upon my objection to the proposed class action settlement in the Neiman Marcus data breach case. I have also included the following attachments for the Court's review:

- A copy of the original notice email I received from the Settlement Administrator (dated July 1, 2025)
- A copy of Mr. Geddes's email response to me (dated September 5, 2025)
- Copies of all other correspondence I received from class counsel

Thank you for your time and consideration.

Sincerely,




Bruce Isacson

CC:

Neiman Marcus Data Breach Settlement Administrator
c/o Kroll Settlement Administration
PO Box 225391
New York, NY 10150-5391

Tina Wolfson, Class Counsel
Ahdoot & Wolfson, PC
2600 West Olive Avenue, Suite 500
Burbank, CA 91505



BRUCE ISACSON

September 9, 2025

The Honorable Brian Morris

United States District Court
District of Montana
Paul G. Hatfield Courthouse
901 Front Street, Suite 2100
Helena, MT 59626

RE: Objection to Class Action Settlement – Neiman Marcus Data Breach (Case No. 2:24-MD-3126-BMM)

Dear Judge Morris,

My name is Bruce Isacson, and I am writing to respectfully reaffirm and expand upon my **objection** to the proposed class action settlement in the *Neiman Marcus data breach case*.

I first became aware of this settlement when I received an email from the Settlement Administrator on July 1, 2025. I am attaching that original message for the Court's review. I submitted my objection by mail the very next day, on July 2. I did not receive any response from class counsel until August 20, nearly seven weeks later, after my objection had already been entered into the court record.

I feel compelled to speak not only on my own behalf but on behalf of many consumers who have likely received similar notices over the years. I am 76 years old, and throughout my life, I have received countless emails and mailers regarding class action settlements. Most of them, I ignored, because the benefit to the consumer always seemed negligible, while the attorneys walked away with significant sums. This time, I chose to finally say something.

These types of settlements, where the company responsible avoids admitting wrongdoing and the attorneys collect a large payout while the vast majority of class members receive little or nothing, undermine the very concept of justice. In this case, the proposed 3.5 million dollar settlement raises a clear question: if only a small percentage of consumers submit valid claims, where does the remaining balance of the fund go? Do the attorneys retain it? Does it revert to Neiman Marcus? The public deserves transparency.

If there is no clear plan for redistributing unclaimed funds to the class, that too strikes me as deeply unfair.

I also feel it is important to correct a statement made by class counsel in their response to my objection. Mr. Geddes wrote that I made "several attempts through the settlement administrator" to reach them. That is not true. I only attempted to call the toll-free number provided in the official notice: 1 855 338 2018. That number leads to a robotic voice system that offers no opportunity to speak with a live person or leave a message. I tried again this week and confirmed the same. This is not meaningful access, and certainly not the kind of open communication that class counsel now claims to offer. Attached is a copy of Mr.



BRUCE ISACSON

Geddes's email response dated September 5, 2025, along with all other correspondence I received from the attorneys.

What frustrates me most is the characterization of the proposed benefits as "substantial" and "immediate." I would ask the Court to consider how many class members will receive anything close to the substantial amount the attorneys are requesting for themselves. I expect the vast majority of affected consumers will receive no compensation at all, either because they do not respond or because they cannot document precise financial losses. Meanwhile, the attorneys will walk away with over one million dollars. That disparity, to me, is an injustice.

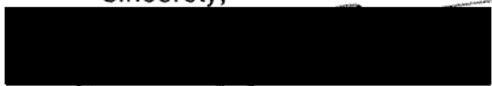
Even the "credit monitoring" benefit is misleading. I already receive credit alerts from various free services and banks. Offering two years of monitoring does not undo the violation of my privacy or the risk of identity theft that Neiman Marcus caused. The real harm here is being monetized by the attorneys and packaged as a win for the class. It is not.

Finally, I find it telling that class counsel made no attempt to contact me until my objection was formally filed. If their intent was to engage in meaningful dialogue, there was ample opportunity before that point. Instead, their response came only after my objection became part of the court record. That timing, I believe, speaks for itself.

I submit this letter out of a genuine concern that the class action system, as currently practiced, often benefits lawyers far more than the injured parties it claims to protect. I hope my letter gives voice to others who may not have the time, energy, or understanding of the legal system to speak for themselves.

Thank you for your time and consideration.

Sincerely,


Bruce Isaacson

CC:

Neiman Marcus Data Breach Settlement Administrator

c/o Kroll Settlement Administration

PO Box 225391


New York, NY 10150-5391

Tina Wolfson, Class Counsel

Ahdoot & Wolfson, PC

2600 West Olive Avenue, Suite 500

Burbank, CA 91505



Subject: NEIMAN MARCUS COURT ORDERED NOTICE OF CLASS ACTION SETTLEMENT

Date: Tuesday, July 1, 2025 at 7:20:39 AM Pacific Daylight Time

From: Neiman Marcus Data Breach Litigation Settlement Administrator

To: [REDACTED]

United States District Court for the District of Montana

In re: Snowflake, Inc. Data Security Breach Litigation (Neiman Marcus Group LLC)

If your Personal Information was impacted in the Data Incident involving Neiman Marcus Group LLC, in May of 2024, you may be entitled to benefits from a settlement.

A Court authorized this Notice. This is not a solicitation from a lawyer.

You can file your Claim Form [here](#).

A \$3,500,000 Settlement has been reached in a class action lawsuit against The Neiman Marcus Group LLC ("Defendant") arising out of a data security incident that Defendant detected in May of 2024 ("Data Incident"). The Defendant discovered unauthorized access to its computer network resulting in potential access to Personal Information of Settlement Class members. "Personal Information" means Settlement Class members' information that may have been exposed in the Data Incident, which may include: names, email addresses, dates of birth, gift card information, partial credit card numbers, and the last four digits of Social Security numbers.

The purpose of this Notice is to inform you of the class action and the settlement so you may decide whether to file a Claim Form, opt-out, object, or do nothing.

Who's Included? Records show you are a Settlement Class Member, defined as: All persons who live in the United States whose Personal Information was potentially compromised as a result of the Data Incident.

What Does the Settlement Provide? As a Settlement Class Member, the following Settlement Class Member Benefits are provided as a result of the Settlement. You can submit a Claim Form online or by mail postmarked by **October 8, 2025**.

Documented Losses Cash Payment: You may submit a Claim Form and provide documentation showing that you incurred losses related to the Data Incident for up to \$2,500.00 per Settlement Class Member; **AND/OR**

Credit Monitoring: In addition to a Documented Losses Cash Payment, you may also submit a Claim Form to receive two years of free Credit Monitoring.

You must submit your Claim Form [here](#) or by mail postmarked by **October 8, 2025**.

Other Options. If you do not want to be legally bound by the Settlement, you must opt-out of the Settlement by submitting a personally signed by hand request to opt out by mail that must be postmarked by **September 23, 2025**. If you do not opt-out, you will give up the right to sue and will release the Defendant and Released Parties with respect to the legal claims in this lawsuit. If you do

not opt out, you may object to the Settlement by **September 23, 2025**. The Long-Form Notice on the Settlement Website explains how to opt-out or object.

If you do nothing, you will get no Settlement Class Member Benefits, and you will be bound by the Settlement and any judgments and orders. The Court will hold a Final Approval Hearing on **October 23, 2025**, to consider any objections and whether to approve the Settlement, Class Counsel's attorneys' fees of up to one-third of the Settlement Fund and costs. You or your lawyer may attend and ask to appear at the hearing, but you are not required to do so. The hearing may be held remotely, and if so, instructions will be at www.NMGsettlement.com.

This Notice is a summary. Learn more about the Settlement [here](#), or by calling toll free 1-855-338-2018.

Name	UniqueID	PIN
BRUCE ISACSON		

If [REDACTED] should not be subscribed or if you need to change your subscription information for Snowflake Data Security Breach Litigation, [please use this preferences page](#).

P.O. Box 3058 Portland, OR 97208-3058

BRUCE ISACSON

July 2, 2025

Clerk of Court

United States District Court
District of Montana
Paul G. Hatfield Courthouse
901 Front Street, Suite 2100
Helena, MT 59626

**Re: Formal Objection to Settlement – In Re: Snowflake, Inc. Data Security Breach
Litigation**

Case No. 2:24 MD 3126 BMM

Claim ID: [REDACTED] PIN: [REDACTED]

Dear Judge Morris:

I respectfully submit this formal objection to the proposed class action settlement involving The Neiman Marcus Group LLC. As a Settlement Class Member, I do not believe this agreement is just or equitable to consumers like me.

Over the years, I have received many notices about class action settlements. I usually ignore them, but this one was different. When I first saw the notice informing me I was a Settlement Class Member and might be eligible to receive up to \$2500 dollars in compensation, it genuinely caught my attention. That kind of help would be a blessing to my family right now. But then I read the fine print, and realized that unless I could somehow prove a direct financial loss, I would receive nothing. That felt both misleading and unjust.

I made a substantial purchase at Neiman Marcus in Beverly Hills in the early 2000s, a diamond ring for my wife that cost me approximately \$5000 dollars. I provided my personal information at the time, and now I learn that Neiman Marcus allowed that information to be compromised. Yet despite the breach, I am being told I must document a specific financial loss in order to qualify for compensation. That is not how justice should work.

The burden of proof in such cases should not fall on Settlement Class Members. It would require a complex and costly investigation to determine who accessed my data and how it may have been used. Meanwhile, the law firm claiming to represent me is receiving over 1.1 million dollars, nearly one third of the 3.5 million dollar settlement, yet I am not allowed to contact them directly, ask questions, or seek clarification. There has been no meaningful communication with the Settlement Class Members they claim to represent.

[REDACTED]

BRUCE ISACSON

In truth, we have had no voice in this process. That is a closed system where lawyers profit while the individuals they supposedly represent are left in the dark.

I am currently living on very limited means. My wife and I just celebrated our 45th wedding anniversary on June 28, and our adopted son just turned 15 on June 26. We are doing our best to provide for him, and for each other. The promise of 2500 dollars, based on a breach of my personal information, seemed like a fair opportunity for restitution. But now I see it is largely inaccessible, while the law firm secures a guaranteed windfall. That feels deeply unbalanced.

If the Court finds merit in this objection, I respectfully ask that the ruling be made public so that stronger protections can be established for Settlement Class Members in future cases throughout the United States. I also ask that the Court consider awarding me a fair and reasonable amount for raising these concerns on behalf of others who, like me, have long felt powerless in these legal processes.

Finally, I urge the Court to ask: How much money did Neiman Marcus gain, directly or indirectly, from the handling or sale of customer data? And if our data was indeed compromised, should we really have to carry the burden of proving how it was misused?

Thank you for your time and for considering this objection. I respectfully ask that you not approve the proposed settlement in its current form. I sincerely hope this letter reaches the Court directly.

Respectfully,

BRUCE ISACSON, producer/director/writer

LIONHEART MOVIES, Inc.

<http://lionheartmovies.com>

Claim ID: [REDACTED]

PIN: [REDACTED]

CC:

Neiman Marcus Data Breach Settlement Administrator
Tina Wolfson, Class Counsel, Ahdoot & Wolfson, PC

Subject: RE: Neiman Marcus: Objection to Class Action Settlement
Date: Friday, September 5, 2025 at 12:18:04 PM Pacific Daylight Time
From: Devlan Geddes
To: [REDACTED]
CC: John Heenan, Jeff Ostrow
Attachments: image007.png, image008.png, image009.png, image010.png, image011.png, image012.png, image013.png

Dear Mr. Isacson:

Thank you for sharing your concerns; although we may see some issues differently, we appreciate your engagement.

I understand from your message that you wanted to visit with us and made several attempts through the settlement administrator. We (class counsel) are available to you. **Are there any questions about the proposed settlement you have?** We would welcome the opportunity to discuss them with you directly, as a real-time conversation is often the most effective way to address questions and clear up any misunderstandings.

We remain confident that the proposed settlement offers substantial, immediate benefits: reimbursement for any out-of-pocket losses and years of credit-monitoring services to help safeguard you and the rest of the class from potential fraud or misuse of personal information. These protections would be available now, avoiding the long delays and uncertain results that often accompany extended litigation.

Regarding your point about class actions, we respectfully note that the class-action mechanism is purely procedural; it does not alter substantive rights or lower the burden of proof in any way. We hope this clarification is useful and remain ready to speak at your convenience.

Best, Devlan

J. Devlan Geddes | Partner
 GOETZ, GEDDES & GARDNER, P.C.
 The Ketterer Building | 35 N. Grand Ave.
 P.O. Box 6580 | Bozeman, MT 59771-6580
 Phone: (406) 587-0618
 Web: www.goetzlawfirm.com
 Email: devlan@goetzlawfirm.com

GOETZ, GEDDES & GARDNER P.C.
 ATTORNEYS AT LAW

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From: [REDACTED]
Sent: Thursday, September 4, 2025 5:07 PM

To: Devlan Geddes <Devlan@Goetzlawfirm.com>

Cc: John Heenan <john@lawmontana.com>; Jeff Ostrow <ostrow@kolawyers.com>

Subject: Re: Neiman Marcus: Objection to Class Action Settlement

Dear Mr. Geddes, Mr. Ostrow, and Mr. Heenan,

I have decided not to engage in any phone discussions regarding my July 2 objection to the Neiman Marcus class action settlement. Given the number and tone of communications I have received following the Court's acceptance of my objection, I now believe that any response should be handled transparently and in writing. That is how I will proceed.

Regarding your September 4 email, Mr. Geddes, I would like to address several points directly.

First, I am troubled by the tone and framing of your response. As one of the class members this case is supposed to represent, I believe your language was unnecessarily condescending and dismissive. The legal rhetoric used to correct my objection feels more like an attempt to discredit my concerns than to understand or address them. That is unfortunate.

You wrote that my statement "That is not how justice should work" is incorrect, and then asserted that the law requires claimants to document their damages before being entitled to compensation. However, this is not a typical individual lawsuit. This is a class action, and class actions exist precisely because it is often impractical or even impossible for victims to document their losses individually, especially when dealing with data breaches and intangible harms.

It appears that the law is being used here not to restore justice to injured parties, but to create a structure where the majority of class members will receive little to nothing, while the attorneys involved are still compensated handsomely. If, as you claim, the compromised data was mostly limited to names and email addresses and did not include Social Security numbers, then I must ask: why was this class action filed in the first place? If most class members were not meaningfully harmed, the only logical conclusion is that the case was pursued because it was a profitable legal opportunity rather than a vehicle for meaningful justice.

Furthermore, your email states that class counsel is accessible. My experience does not reflect that. I was unable to reach a single attorney through the number provided in the notice and could not even leave a voicemail. That is not what accessibility looks like, and it raises serious concerns about transparency.

In addition, none of you reached out to me until after the Court had already accepted my objection. Only then did I begin receiving multiple calls, texts, and emails. I must ask why class counsel only initiated this direct contact once my concerns became part of the official record.

I believe the Court would benefit from seeing this correspondence, as it raises serious concerns about the fairness and transparency of the settlement process. These concerns affect not only myself but potentially thousands of class members. While I have not yet submitted a formal supplement to my objection by mail, I have seriously considered doing so and may still proceed depending on the direction this exchange continues to take.

Respectfully,
Bruce Isacson

[REDACTED]
BRUCE ISACSON, producer/director/writer
LIONHEART MOVIES, Inc.

[REDACTED]
<http://lionheartmovies.com>

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From: Devlan Geddes <Devlan@Goetzlawfirm.com>
Date: Thursday, September 4, 2025 at 12:25 PM
To: [REDACTED]
Cc: John Heenan <john@lawmontana.com>, Jeff Ostrow <ostrow@kolawyers.com>
Subject: RE: Neiman Marcus: Objection to Class Action Settlement

Mr. Isacson:

Mr. Hennan and I would like to discuss why we believe the proposed settlement is good for the Neiman Marcus class members and encourage you to withdraw your objection. Specifically, the compromised data for the majority of the Neiman Marcus class members was limited to disclosure of names and email addresses only. A very small number of class members had some additional information disclosed, such as outdated and expired gift card information, partial credit card numbers, and driver's license numbers. Not a single Neiman Marcus customer had their Social Security information disclosed. That is why the settlement provides two types of benefits. First, for folks who were actually damaged by the release of their personal information, they may seek a cash benefit for up to \$2,500 for documented losses. Second, for folks who were not damaged by the release of their personal information, they can still secure peace of mind by electing to receive two years of credit monitoring.

Regarding your request to identify items of disagreement in your objection, I respectfully note the following:

1. You object to documenting your loss in order to qualify for compensation stating "[t]hat is not how justice should work." To the contrary, that is precisely how justice works. It is a basic requirement under the law that a claimant must be able to prove they were damaged before being entitled to compensation. The burden of proof for recovering damages is always on the plaintiff making the claim.
2. We disagree with your statement that you are not allowed to contact class counsel to ask questions or seek clarification. Although we represent the class through the named class representatives, this class is represented by a number of lawyers who are available to speak with all class members to answer questions and address concerns.
3. We disagree with your statement that there has been no meaningful communication with settlement class members. To the contrary, our representation of the class is

directed by the named class representatives who, themselves, are also class members.

The purpose of a class action lawsuit is to provide a legal mechanism for a group of people who have suffered similar harm from the same defendant to collectively pursue justice and compensation. Instead of numerous individuals filing separate lawsuits for similar harms, a class action consolidates these claims into a single case, streamlining the legal process and conserving judicial resources. Class actions enable individuals with relatively small claims, who might not otherwise find it financially viable to pursue individual lawsuits, to seek redress for their injuries. The costs of litigation are shared amongst the class members, making legal action more accessible. Class actions can be a powerful tool for holding large corporations and other entities accountable for widespread harm caused by their actions or negligence. The potential for significant financial consequences incentivizes companies to adopt better practices and comply with legal standards. By resolving similar claims in a single proceeding, class actions help ensure that all affected parties receive fair and consistent treatment and avoid potentially conflicting judgments that could arise from separate lawsuits. In sum, class action lawsuits provide a way for individuals with similar grievances to unite, share legal costs, and hold defendants accountable, especially in cases where individual lawsuits might be impractical or uneconomical.

I hope this email helps you understand why we would like to have a conversation with you and answer your questions regarding the proposed class action settlement. Do you have availability sometime today or tomorrow to discuss your objection with us?

Thank you, Devlan

J. Devlan Geddes | Partner
GOETZ, GEDDES & GARDNER, P.C.
The Ketterer Building | 35 N. Grand Ave.
P.O. Box 6580 | Bozeman, MT 59771-6580
Phone: (406) 587-0618
Web: www.goetzlawfirm.com
Email: devlan@goetzlawfirm.com

GOETZ, GEDDES & GARDNER P.C.
ATTORNEYS AT LAW

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From: [REDACTED]
Sent: Wednesday, August 20, 2025 7:55 PM
To: Devlan Geddes <Devlan@Goetzlawfirm.com>
Cc: John Heenan <john@lawmontana.com>
Subject: Re: Neiman Marcus: Objection to Class Action Settlement

Dear Mr. Geddes and Mr. Heenan,

Thank you for your email.

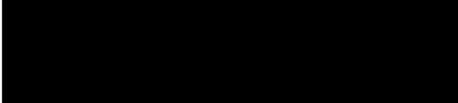
Since my objection letter already outlines my concerns in full, I would appreciate it if you could first explain in writing what you wish to discuss. Once I understand the purpose of the call, I will be happy to consider it.


If there is anything you disagree with in my objection, I would expect you to be specific in your response. I made every effort to be transparent, both for myself and for the many individuals whose voices are rarely heard in this classic class-action process. It is a process that is supposed to serve the very people it claims to protect with fair and tangible restitution.

I look forward to hearing from you.


Sincerely,

Bruce Isacson


BRUCE ISACSON, producer/director/writer
LIONHEART MOVIES, Inc.


<http://lionheartmovies.com>

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From: Devlan Geddes <Devlan@Goetzlawfirm.com>
Date: Wednesday, August 20, 2025 at 10:23 AM
To: 
Cc: John Heenan <john@lawmontana.com>
Subject: Neiman Marcus: Objection to Class Action Settlement

Mr. Isacson:

I, along with John Heenan (copied), are two of five Co-Lead Counsel in *In Re: Snowflake, Inc. Data Security Breach Litigation*, Case No. 2:24 MD 3126 BMM. I am writing in response to your July 2, 2025 Objection to the Neiman Marcus Group proposed class settlement. Do you have availability sometime over the next week to discuss your objection with us? Mr. Heenan and I will do our best to accommodate your schedule.

Thanks, Devlan

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iMessage/Text Message from Jeff Ostrow [REDACTED]
[REDACTED]

Tues, Sep 2 at 7:58 AM

Mr. Isacson- my name is Jeff Ostrow. I'm one of the Plaintiffs' lawyers for the Neiman Marcus settlement. I wanted to speak with you about your July 2 letter to the court about the settlement. Are you available at any time today?

Thank you,

Jeff Ostrow

Bruce Isacson iMessage Response:

Tues, Sep 2 at 12:30 PM

Hi Mr. Ostrow, thank you for reaching out. Since I received a similar request from Mr. Geddes and Mr. Heenan, I've already responded to them in writing. For consistency, I'm including my reply here as well, which you can respond to: [REDACTED]:

"Dear Mr. Geddes and Mr. Heenan,

Thank you for your email.

Since my objection letter already outlines my concerns in full, I would appreciate it if you could first explain in writing what you wish to discuss. Once I understand the purpose of the call, I will be happy to consider it.

If there is anything you disagree with in my objection, I would expect you to be specific in your response. I made every effort to be transparent, both for myself and for the many individuals whose voices are rarely heard in this classic class action process. It is a process that is supposed to serve the very people it claims to protect with fair and tangible restitution.

I look forward to hearing from you.

Sincerely,

Bruce Isacson"

Attachment 2



Neiman Marcus Data Breach Litigation
Exclusion Report

Number	First Name	Last Name
1	RYAN	BALANDRAN
2	PAISEN	LIN
3	JOHN DUSTIN	MCCULLOUGH JR
4	CYNTHIA	CASSIDY
5	DANIELA	ZAPICO
6	ROBERT	KESENCI
7	BARBARA	JORDAN
8	CHRISTINE	MCMAHON
9	LAURA	BARR
10	TAYLOR	HILL
11	ANNE	CONSOLACION
12	JANE	PITTMAN
13	MARSHA	BUKOWSKI
14	SAM	FULTON
15	SIYLVIA	BASS
16	JONATHAN	SATO
17	JESSICA	STECHSCHULTE
18	RICARDO	SANGUINO ORTIZ
19	TANYA	TANKOU
20	JONATHAN	BERG
21	DENNY	KIM
22	SARA	TAKIEDDINE
23	FUHE	GUAN
24	OWEN	LAREAUX
25	LOUISE	CHEUNG
26	JULIA	LIPE
27	BRITTANY	BURNS
28	BRIAN	FERGUSON
29	MARISA	URTEAGA WATKINS
30	MATTHEW	SMITH
31	JOSEPH	SIDES
32	GRACE	HERRIN
33	GAIL	PADRICK
34	BRENT	STACKHOUSE
35	LINDSAY	MCGUIRE
36	ADIS	CAJIC
37	THERESE	MENDENHALL
38	MICHAEL	LIN
39	MAUREEN	SULLIVAN
40	EMILY	TAXIS
41	PERVIS	BALLEW JR
42	ALEXIS	BOWMAN
43	KATHLEEN	TICE
44	POONAM	SUBBAIAH
45	TRACY LYNN	WEISS
46	NATALIYA	ARTEMIEVA
47	GAIL	REEVES
48	HAO	WANG
49	WANG	HAOZHE
50	ERICA	MCGINN
51	VIRGINIA	KELLER