1	Steve W. Berman (pro hac vice)	Jeffrey L. Kessler (pro hac vice)
2	Emilee N. Sisco (pro hac vice)	David G. Feher (pro hac vice)
2	Stephanie Verdoia (pro hac vice)	David L. Greenspan (pro hac vice)
3	Meredith Simons (SBN 320229)	Adam I. Dale (pro hac vice)
	HAGENS BERMAN SOBOL SHAPIRO LLP	Sarah L. Viebrock (<i>pro hac vice</i>)
4	1301 Second Avenue, Suite 2000 Seattle, WA 98101	WINSTON & STRAWN LLP 200 Park Avenue
5	Telephone: (206) 623-7292	New York, NY 10166-4193
	steve@hbsslaw.com	Telephone: (212) 294-6700
6	emilees@hbsslaw.com	jkessler@winston.com
7	stephaniev@hbsslaw.com	dfeher@winston.com
<i>'</i>	merediths@hbsslaw.com	dgreenspan@winston.com
8		aidale@winston.com
0	Benjamin J. Siegel (SBN 256260)	sviebrock@winston.com
9	HAGENS BERMAN SOBOL SHAPIRO LLP	
10	715 Hearst Avenue, Suite 300	Jeanifer E. Parsigian (SBN 289001)
	Berkeley, CA 94710	WINSTON & STRAWN LLP
11	Telephone: (510) 725-3000 bens@hbsslaw.com	101 California Street, 34th Floor San Francisco, CA 94111
12	bens@nossiaw.com	Telephone: (415) 591-1000
12	Class Counsel for Plaintiffs	jparsigian@winston.com
13	Class Counsel for Flandings	jparsigiane winston.com
14	[Additional counsel on signature page]	Class Counsel for Plaintiffs
15		
16	UNITED STATE	S DISTRICT COURT
17	NORTHERN DIST	RICT OF CALIFORNIA
18	OAKLA	ND DIVISION
	OAKLA	ND DIVISION
19	IN RE COLLEGE ATHLETE NIL LITIGATION	Case No. 4:20-cv-03919-CW
20		DECLARATION OF CARLA A. PEAK RE:
21		NOTICE PROCEDURES
22		
		Judge: Hon. Claudia Wilken
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I, Carla A. Peak, declare and state as follows:

- 1. I have personal knowledge of the matters set forth herein and if called as a witness I could and would testify competently to them.
- 2. I am a nationally recognized expert in the field of legal notification, and I have served as an expert in countless federal and state cases involving class action notice plans.
- 3. I am a Vice President of Legal Notification Services for Verita Global, LLC ("Verita"), formerly known as KCC Class Action Services, LLC ("KCC"). Pursuant to the Revised Order Granting Plaintiffs' Motion for Preliminary Settlement Approval as Modified (the "Preliminary Approval Order") dated October 7, 2024, the Court appointed Verita as the Claims Administrator in connection with the proposed Settlement of the above-captioned Action.¹

CLASS LIST

- 4. On or around June 3, 2024, Verita understands that Defendants notified their Division I member institutions ("schools") to provide Verita with data to effectuate notice in the above captioned action. Schools were directed to a website, https://www.kccconnect.com/NCCOUpload, where schools can download data templates, instructions, and upload their athlete roster data through an online portal. The two data templates that were posted on the website are 1) Power5 template and 2) non-Power5 template. Class Counsel and Verita additionally created a Yearly template to assist different schools' data storage systems, but this template had to be specifically requested. The templates asked for NCAA EC IDs, names, addresses, email addresses, sport played, years played, GIA status (if Power5), and redshirt years. True and correct copies of the templates and instructions are attached hereto as Exhibit A, B, and C.
- 5. Beginning August 8, 2024, through January 31, 2025, Verita received at least 534 separate data file submissions from 325 Division 1 (D1) schools. In some submissions, there were multiple data files uploaded or in each data file there would be multiple tabs of data. As Verita processed incoming data files, it was found that some schools needed to provide additional information, or provide the

¹ All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Settlement Agreement, dated September 26, 2024 (the "Stipulation") and/or the Preliminary Approval Order.

information in a different format, i.e., sports, years played, NCAA EC IDs, or GIA statuses were missing or incorrect. As a result, some schools were asked to provide new and/or supplemental data.

- 6. As data files arrived, Verita formatted the lists for mailing purposes and removed duplicate records. Duplicates were removed per data file and not across the entire data population. As a result, some college athletes received multiple notices either because their school provided data on multiple occasions or because the athlete attended multiple schools. On average, athletes were sent direct notice 2.5 times.
- 7. Verita also processed the names and addresses through the National Change of Address Database ("NCOA") to update any addresses on file with the United States Postal Service ("USPS"). A total of 43,203 addresses were found and updated via NCOA. Verita updated its proprietary database with the Class List. A list of schools that provided data is attached hereto as Exhibit D.
- 8. Due to multiple data submissions from schools, Verita deduped claims and records based on athlete and school. This means an athlete may be listed in Verita's records multiple times because the athlete attended multiple schools.
- 9. In summary, Verita received approximately 436,807 unique student records based on athlete and school. Verita can also estimate that there would be 30,833 unique student records at the 37 schools that did not provide data. The resulting total athlete records for all the schools in the class would be 467,640. Based on analysis of claim data which showed, on average, athletes attended 1.2 schools, Verita estimates the unique athlete count across all schools i.e., the class size is approximately 389,700 students.

NOTICE PLAN

<u>Overview</u>

- 10. Verita designed and implemented a notice plan (the "Notice Plan") to provide notice to the Settlement Classes. The Notice Plan consisted of direct, individual notice to all known class members and publication notice comprised of digital media, press releases, and an organic media effort.
- 11. Verita estimates that approximately 96.4% of the Settlement Classes received notice, considering the combined direct notice and digital media notice efforts alone. Although not measurable,

frequency of exposure among the Settlement Classes.

Mailing of the Notice

the reminder notice, press releases and extensive organic media effort served to further extend reach and

- 12. Verita identified 362 D1 schools as being eligible to participate in the Settlement. Of the 362 D1 schools, 70 were Power5 schools. From August 8, 2024, through October 17, 2024, Verita received data submissions from 127 D1 schools. On October 18, 2024, Verita printed and mailed the first round of the House Postcard Notice (collectively, the "Notice") to 19,203 names and mailing addresses from 51 D1 schools who provided data. A true and correct copy of the House Postcard Notice is attached hereto as Exhibit E.
- 13. Verita continued to mail notices on a rolling basis. From October 21, 2024, through January 31, 2025, Verita mailed notices to the remaining 274 schools who provided data. Verita did not receive data from 37 D1 schools.²
- 14. From October 18, 2024, through January 27, 2025, Verita completed 17 rounds of postcard noticing and sent a total of 91,084 Notices.
- 15. Since mailing the Notices to the class members, Verita has received 1,071 Notices returned by the USPS with forwarding addresses. These 1,071 Notices were associated with 618 unique Claim IDs. Verita immediately caused Notices to be re-mailed to the 513 forwarding addresses supplied by the USPS. Verita did not remail Notice to the 105 athletes whose notice was returned with a forwarding address because Verita received claim form or payment information from these athletes, or their notice was returned after the filing deadline.
- 16. Since mailing the Notices to the class members, Verita has received 23,619 Notices returned by the USPS with undeliverable addresses. These 23,619 undeliverable Notices were associated with 13,448 unique Claim IDs. Through credit bureau and/or other public source databases, Verita performed address searches for these undeliverable Notices and was able to find updated addresses for 867 class members. Verita promptly re-mailed Notices to the newly found addresses.

² As described in the text below, Verita also engaged in a robust publication notice campaign, to maximize the likelihood that all class members received notice of the settlement, including a second press release publication one week prior to the claims deadline.

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Emailing of the Notice

- 17. Verita also processed 455,202 email addresses through an email cleanse. The email cleanse process fixes common typographical errors in domain names, corrects insufficient domain suffixes (e.g., gmal.com to gmail.com, etc.), and removes known bad email addresses. Email addresses not designated as a known bad address were then verified by contacting Internet Service Providers to determine if the email address exists. Of the 455,202 email addresses, 82,364 were found to be invalid email addresses. Starting October 18, 2024, through January 27, 2025, Verita caused the House Email Notice to be sent to the valid email addresses. A true and correct copy of the email notices is attached hereto as Exhibit F.
- 18. On a rolling basis, Verita mailed the Postcard Notices to athletes whose email notice was not successfully delivered and who had a complete mailing address on file. In total, approximately 22,366 Postcard Notices were sent to mailing addresses of athletes whose email notice was not successfully delivered.
- 19. From October 18, 2024, through January 27, 2025, Verita performed 17 rounds of email campaigns, sending a total of 372,838 email notices.
- 20. Verita sent a total of 463,922 postcard and email notices. Verita has been able to identify 53,068 exact duplicate records based on the athlete's name and school. These duplicates derived from schools resubmitting corrected/updated data files. As a result, some athletes received multiple notices.
- 21. With the combined Postcard and Email notices, approximately 81.9% of class members received direct notice. Even when just considering direct notice, this is alone above the estimated reach proposed at preliminary approval and is considered reasonable by The Federal Judicial Center's *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide* (the "FJC Checklist").³

Reminder Summary Notice

22. On January 24, 2025, Verita caused an Email Reminder notice to be sent to 252,990 college athletes who, at the time, had not yet submitted a claim and whose initial email notice was

³ The *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide* states: "The lynchpin in an objective determination of the adequacy of a proposed notice effort is whether all the notice efforts together will reach a high percentage of the class. It is reasonable to reach between 70-95%."

successfully delivered. A true and correct copy of the Email Reminder Notice is attached hereto as Exhibit G.

Publication Notice

23. Verita purchased approximately 72,800,000 impressions4 to be distributed programmatically across a variety of websites and mobile apps, as well as on Facebook, Instagram, Tik Tok, YouTube, and Reddit from October 18, 2024, through December 16, 2024. The impressions were delivered via display banner, image, and video ads consisting of text and imagery designed to catch the attention of likely student athletes and were directly linked to the settlement website. The impressions were demographically targeted to adults 18-34 years of age. Where available, additional targeting was layered to include demographics, including self-stated college students or college graduates, to users indicating membership in NCAA or student/college athletics; and/or contextual targeting alongside content related to news and/or college sports; and/or behaviors, for example to those whose online behavior indicates interest in college sports, NCAA sports, NCAA accounts, etc. This targeted digital media campaign alone was designed to reach more than 80% of likely class members in this settlement. Additional impressions were delivered via paid search campaigns serving text ads alongside Google, Yahoo, and Bing search engine results when keywords related to the litigation were triggered. A total of 75,363,111 impressions were delivered, resulting in an additional 2,563,111 impressions at no extra charge. Confirmation of the digital notices as they appeared on a variety of websites and on Facebook, Instagram, TikTok, YouTube, Reddit, Google, and Bing/Yahoo search is attached hereto as Exhibit H.

24. Verita also caused a press release to be distributed nationally via PR Newswire on October 18, 2024. The press release was distributed via PR Newswire's national newsline as well as a General College Media Influencer List and included syndicated distribution via AP News. According to PR

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⁴ An impression is a count of the number of times a digital notice is displayed to a user. Impressions are used as a metric to measure the reach and exposure of an advertisement. Over 75 million paid digital media impressions were delivered to the target audience, meaning likely class members had over 75 million opportunities to be exposed to a Notice via the paid digital media notice alone. Class members received additional opportunities to learn about the settlement via the direct notice effort, press release, and organic earned media.

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- Newswire, the press release was viewed 9,859 times and picked up by over 910 news outlets⁵ including CBS News Radio, Fox News, New York Times, WKRN Nashville, Tennessee, WGN9 in Chicago, Illinois, KDVR Fox31 in Denver, Colorado, KRON4 in San Francisco, California, KXAN-TV NBC-3 in Austin, Texas, and KSWB-TV Fox-5 in San Diego, California. A true and correct copy of the press release is attached hereto as Exhibit I.
- 25. As part of the notice program, Verita commenced an outreach effort the week of October 21, 2024. This organic outreach effort was performed via social media, ⁶ email, mail, and other methods to contact a variety of relevant influencers, current and former college athletes, college athletes based on school athletic team rosters during the relevant class periods, player associations, conferences, sports groups, collegiate alumni associations, sports agents and sports marketers to solicit their assistance in sharing the settlement information and encourage claims filing.
- 26. On January 21, 2025, a second press release was distributed nationally via PR Newswire's national newsline as well as a General College Media Influencer List and a syndicated distribution via AP News. According to PR Newswire, the press release was viewed 3,663 times and picked up by over 525 news outlets⁷ including WFLA in Tampa, Florida, KTLA Los Angeles, California, WJW-TV Fox-8 in Cleveland, Ohio, and WXIN-TV Fox-59 in Indianapolis, Indiana. A true and correct copy of the press release is attached hereto as Exhibit J.

SETTLEMENT WEBSITE

27. Verita established a website, www.collegeathletecompensation.com, dedicated to this matter to provide information to the class members and to answer frequently asked questions. The website URL was set forth in the Notice, Publication Notices, Long Form Notice, and the Claim Form. Visitors of the website can download copies of the Notice, Claim Form, and other case-related documents. Visitors can also submit claims online and upload supporting documentation. As of February

⁵ The total potential audience of the news outlets reporting the story directly from PR Newswire is 160,985,946.

⁶ In certain instances, athletes received a personal outreach via LinkedIn.

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20, 2025, there have been 838,271 users, 1,390,401 sessions/hits (active visits to the website), and 4,801,982 page views of the Settlement Website.

- 28. From October 18, 2024, through January 31, 2025, Verita received, on average, 852 claims per day. Throughout this claim period, the settlement website did not experience any mass outage or downtime. While Verita did receive notifications of isolated users having issues accessing the website, in each of those instances, the user self-reported that the issue was resolved on their end or Verita was able to troubleshoot the issues individual users were having through Verita's call center agents. Since the activation of the website, there was not a single day that Verita received less than 80 web submissions. As noted above, there were some issues with school data reports—including incorrect eligibility center identification numbers—but these issues were predominantly resolved and over 70,252 athletes were able to file claims using their eligibility center ID or their Claim ID and PIN.
- 29. On December 17, 2024, Verita publicized on the settlement website individual allocation estimates for 392,298 athletes for whom Verita received school data. The allocation estimates were updated if Verita received corrected, updated data from schools.

TELEPHONE HOTLINE

30. Verita established and continues to maintain a toll-free telephone number, 1-877-514-1777, for athletes to call and obtain information about the Settlement, and/or request a Notice Packet. The telephone hotline became operational on October 18, 2024, and is accessible 24 hours a day, 7 days a week. As of February 20, 2025, Verita has received a total of 5,069 calls to the telephone hotline.

EMAIL BOX

31. Verita established and continues maintain email to an box. admin@collegeathletecompensation.com, for athletes to email and obtain information about the Settlement. As of February 10, 2025, there have been a total number of 33,543 emails answered for the Settlement. In addition, Verita has responded to a total of 2,914 voicemails. Based upon the above, the total number of inquiries answered for the case to-date is 36,457. Verita implemented a live call center team to handle emails and voicemails. The total number of hours worked on emails and voicemail call backs is 2,018. On average, all emails were responded to within 1.5 days. Currently, Verita is unaware of any class member who was not provided a response or assistance when requested.

CLAIM FORMS

- 32. The postmark deadline for class members to file claims in this matter was January 31, 2025. To date, Verita has received 98,184 timely-filed web submissions and 5,718 late-filed web submissions. Of the 103,902 total web submissions, 29,233 were payment updates and 74,669 were claim form submissions. To the extent the Court accepts late submissions, Verita will provide updated numbers for the Final Approval Hearing.
- 33. Of the 29,233 payment updates, 28,816 were considered unique. Of the 74,669 claim form submissions, 73,115 were considered unique.
- 34. Of the total submissions, 47,069 were claim forms or payment updates from P5 students. 23,459 of those submissions were P5 football or basketball athletes. As of February 27, 2025, the online portal is still active and 5,718 athletes have submitted claims post the claims filing deadline and website visitors are continuing to file claims.
- 35. Verita received a total of 101,931 unique claim forms or payment updates, which means approximately 26.2% of all settlement class members participated in the settlement.

REPORT ON EXCLUSION REQUESTS RECEIVED TO DATE

36. The Notice informs class members that requests for exclusion from the Class must be postmarked no later than January 31, 2025. As of the date of this declaration, Verita has received 844 requests for exclusion. Of the 848 requests for exclusions, 478 were considered duplicates, leaving a total of 370 unique requests for exclusion. Of the 370 unique requests, one rescinded their opt out request, 18 were postmarked late, and 8 were from athletes whose name was not found in Verita's records. It is Verita's understanding, after reviewing public sources, that these athletes competed outside the class period and therefore are not class members. Additionally, one of the late opt outs has contacted Verita to rescind their opt out. A list of the 343 valid class members requesting to be excluded is attached hereto as Exhibit K.

OBJECTIONS TO THE SETTLEMENT

37. The postmark deadline for class members to object to the settlement was January 31, 2025. As of the date of this declaration, Verita has received one (1) objection to the settlement from Provonsha Wells. This is a duplicate objection that was filed with the Court (ECF No.656).

38. Verita was made aware of an objection from Alex Vogelsong declaring he was ineligible for Compensation for Athletic Services. On December 18, 2024, Alex Vogelsong submitted an online claim. Based on Auburn's school data that was provided to Verita, Vogelsong is eligible to receive payment for Compensation for Athletic Services, Lost NIL Opportunities, and a Hubbard payment, and this was published on the settlement website accordingly.

ADMINISTRATION COSTS

- 39. As of February 26, 2025, through the first distribution, Verita estimates its cost of administration to be \$1,558,737.15. Verita's expected total administration costs through final distribution to be \$2,750,000-\$2,950,000.
- 40. Verita's estimated fees and charges are based on certain information provided to Verita by the parties as well as significant assumptions. Accordingly, the estimate is not intended to limit Verita's actual fees and charges, which may be less or more than estimated due to the scope of actual services or changes to the underlying facts or assumptions.

CONCLUSION

- 41. The direct notice effort alone is estimated to have reached more than 80% of settlement class members. When combined with the targeted digital media campaign, the total reach of the Notice Plan is estimated to have reached over 96% of likely settlement class members. The reach and frequency of exposure among the various Settlement Classes was further supplemented by the press releases and extensive outreach effort.
- 42. It is Verita's opinion, based on my individual expertise and experience and that of my Verita colleagues, that the notice plan was the best practicable under the circumstances. The plan was implemented as directed by the Court at preliminary approval and successfully delivered notice to the settlement class members. It comported with the requirements of due process and of Fed. R. Civ. P. 23. It provided for direct notice to all individuals whose contact information was reasonably available. The Notice Plan as implemented is consistent with other effective settlement notice programs and meets the "reasonably certain to inform" due process communications standard of *Mullane v. Cent. Hanover Bank & Trust Co.*, 339 U.S. 306, 315 (1950). The notice program is consistent with the guidelines set forth in

1	Rule 23, the Manual for Complex Litigation, Fourth, and the FJC Checklist, which considers 70% reach
2	among class members to be a "high percentage" and reasonable.
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4	I declare under penalty of perjury under the laws of the United States of America that the
5	foregoing is true and correct.
6	Executed on this 3rd day of March 2025, at Ocean City, New Jersey.
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8	Carla Peak
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10	CARLA A. PEAK
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Exhibit A

Instructions to Submit Student-Athlete Census

Go to https://www.kccconnect.com/NCCOUpload to download the Census Template file in Microsoft Excel format.

Once Census is complete, go to https://www.kccconnect.com/NCCOUpload and click the "HERE" button to Log In. To log in, you will be prompted to enter your School ID Code and PIN. Please use the following Login Information: School ID Code: NCCO PIN Code: 0683.

- a. Please provide the Name of the Institution and your Contact Information as requested on the Upload Census page.
- b. Once you've provided the Name of the Institution and Contact Information, please upload your file by clicking the "Choose File" button. If you need to add or remove files, simply click the plus or minus sign. Once you have your files selected, click "Submit." to securely upload the student-athlete list(s) to the Notice Administrator. If you have any difficulties, please contact the Notice Administrator by email at SchoolAdmin@collegeathletecompensation.com.

You will receive an email confirmation after you have successfully submitted the student-athlete Census.

Instructions to Complete Student-Athlete Census

Please review the instructions and complete the Census before returning to the site to upload your data.

Completing a Census means providing the first, middle (if available) and last name, NCAA EC ID Number, last known email address or last known street address, city, state, ZIP code, semester started and ended, and sport played, for all athletes participating in sports at your institution from Fall 2019 to September 15, 2024.

For football and basketball athletes, it means providing additional information and for a longer time period. It means providing the following for all student-athletes participating in football and basketball at your institution from Fall 2016 to September 15, 2024: first, middle (if available) and last name, NCAA EC ID, last known email address or last known street address, city, state, ZIP code, semester started and ended, sport played, the annual GIA level received or the highest GIA level received (by decimal amount), semesters of ineligibility, transfer year, and (for football players only) position.

While Excel is a common format for most institutions, and the default Census form is an Excel file, you may already have this data in another <u>tabular</u> format, such as a tab-delimited text file. For security and consistency purposes, please transfer your data to the default Census form provided, being sure to adhere to the below Data Submission Guidelines.

Data Submission Guidelines

Types of Data Files

Data is most efficiently and accurately transmitted within the census template provided. Excel is typically the most convenient method for small to moderate volumes of data. If transferring large volumes of data (hundreds of thousands or millions of records), please upload within multiple files of the provided census template.

Excel

The file should contain one sheet per dataset. If the number of records exceeds the capacity of the Excel sheet (too many records) such that the records would need to be split among two or more sheets, an additional copy of the provided census template should be utilized.

Numeric values should be actual values and not formula or calculation results.

Note: Please include the heading row with the exact names listed below.

Appendix A: General Data Structure

Regardless of the type of file for transfer, the data should contain a single record or line for each student-athlete with separate data elements (field or column) for each of the following pieces of information:

Athlete First Name * Semester Start*

Athlete Middle Name or Initial Semester End*

Athlete Last Name * Division I Sport*

Athlete Street Address * Additional Division I Sport

Athlete City *

Athlete State * For FB and BB athletes only (GIA decimal amount)*

Athlete ZIP Code *

Athlete Foreign Province For FB and BB athletes only (Redshirt semester(s) /

Athlete Foreign Postal Code semester(s) of ineligibility)*

Athlete Foreign Country

For FB and BB athletes only (Transfer_Year)*

Athlete Phone Number For FB Athletes only (Position)*

Athlete Email For FB and BB athletes only (Student Athlete Date of

Birth(DOB))

Athlete NCCA EC ID Number*

If you have reached out to the Notice Administrator to provide data structured by year rather than athlete, please confirm you have received a separate template for this data upload.

Thank you for your time and attention. Should you have any questions, please contact the Notice Administrator by email at SchoolAdmin@collegeathletecompensation.com.

Litigation Notice Administrator

^{*} Those elements marked with an asterisk are generally required for all uploads.

		Please provide cont	act information	for each student be	low. Required f	ields are marked with	an asterisk (*).													
		Please provide ema					and the contract of the													
		For Power 5 includi																		
	Years 2015-16 to 2024-25.						If athlete par	rticipated in multiple	sports, then please i	nclude separate rows f	or each sport.									
CAA EC ID umber*	Student Athlete Institution*	Student Athlete First Name*		Student Athlete Last Name*			Student Athlete	Athlete		Semester Start_Year*	Semester End_Year*		For FB and BB athletes only (GIA decimal amount)*	For FB and BB athletes only (Redshirt semester(s) / semester(s) of	For FB and BB athletes only (Transfer_Year)*	For FB Athletes only (Position)*	For FB and BB athletes only (Student Athlete Date of Birth(DOB))	Student	Postal	
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Exhibit B

Instructions to Submit Student-Athlete Census

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- a. Please provide the Name of the Institution and your Contact Information as requested on the Upload Census page.
- b. Once you've provided the Name of the Institution and Contact Information, please upload your file by clicking the "Choose File" button. If you need to add or remove files, simply click the plus or minus sign. Once you have your files selected, click "Submit." to securely upload the student-athlete list(s) to the Notice Administrator. If you have any difficulties, please contact the Notice Administrator by email at SchoolAdmin@collegeathletecompensation.com.

You will receive an email confirmation after you have successfully submitted the student-athlete Census.

Instructions to Complete Student-Athlete Census

Please review the instructions and complete the Census before returning to the site to upload your data.

Completing a Census means providing the first, middle (if available) and last name, last known email address, last known street address, city, state, ZIP code, and NCAA EC ID Number for all student-athletes participating in sports at your institution from Fall 2019 to September 15, 2024.

Data Submission Guidelines

Types of Data Files

Data is most efficiently and accurately transmitted within the census template provided. Excel is typically the most convenient method for small to moderate volumes of data. If transferring large volumes of data (hundreds of thousands or millions of records), please upload within multiple files of the provided census template.

Excel

The file should contain one sheet per dataset. If the number of records exceeds the capacity of the Excel sheet (too many records) such that the records would need to be split among two or more sheets, an additional copy of the provided census template should be utilized.

Numeric values should be actual values and not formula or calculation results.

Note: Please include the heading row with the exact names listed below.

Appendix A: General Data Structure

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Athlete First Name *

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Athlete Last Name *

Athlete Street Address *

Athlete City *

Athlete State *

Athlete ZIP Code *

Athlete Foreign Province

Athlete Foreign Postal Code

Athlete Foreign Country

Athlete Email*

Athlete NCCA EC ID Number*

Year_Start Year

Year End

Division I Sport Played Year

If you have reached out to the Notice Administrator to provide data structured by year rather than athlete, please confirm you have received a separate template for this data upload.

Thank you for your time and attention. Should you have any questions, please contact the Notice Administrator by email at SchoolAdmin@collegeathletecompensation.com.

Litigation Notice Administrator

^{*} Those elements marked with an asterisk are generally required for all uploads.

		Please provide cont Please provide ema For all non-Power F Years 2019 to Septe	il or mailing add ive schools			elds are marked with a th an asterisk (**).	n asterisk (*).								
NCAA EC ID	Student Athlete	Student Athlete First Name*	Student Athlete Middle Name or Initial	Student Athlete Last Name*		Student Athlete Street Address**	Student Athlete		Athlete	Division I Sport Dlayed Vege	Voca Start Voca	Voca End Voca		Foreign Postal	Student Athlete Foreign
Number*	Institution*	First Name*	or Initial	Last Name*	Address**	Street Address**	City**	State**	Zip**	Division I Sport Played_Year	Year_Start Year	Year_End Year	Province	Code	Country
													-		
													-		
													-		
													-		
				1			1								

Case 4:20-cv-03919-CW Document 717-4 Filed 03/03/25 Page 20 of 96

Exhibit C

	For each academic	year, please provi	de athletic informa	ation for each stude	nt below. Required fiel	lds are marked with	an asterisk (*).				
	For Power 5 includ Years 2015-16 to 2			If athlete participated in multiple sports, then please include separate rows for each spor							
Academic Year*	Student Athlete First Name*	Student Athlete Middle Name or Initial	Student Athlete Last Name*	Division I Sport played*	For FB and BB athletes only (GIA decimal amount)*	For FB and BB athletes only (Redshirt semester(s) / semester(s) of ineligibility)*	For FB Athletes only (Position)*				
						1					
						1					

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Exhibit D



Weekly Data Report

All Schools

Arizona State University

Auburn University

Baylor University

Boston College

Brigham Young University

Butler University

Clemson University

Creighton University

DePaul University

Duke University

Florida State University

Georgetown University

Georgia Tech

Indiana University

Iowa State University

Kansas State University

Louisiana State University

Marquette University

Michigan State University

Mississippi State University

North Carolina State University

Northwestern University

Ohio State University

Oklahoma State University

Oregon State University

Penn State University

Providence College

Purdue University

Rutgers University

Saint John's University

Seton Hall University

Southern Methodist University

Stanford University

Syracuse University

Texas A&M University

Texas Christian University

Texas Tech University

University of Alabama

University of Arizona

University of Arkansas

University of California – Berkeley

University of California – Los Angeles

University of Central Florida

University of Cincinnati

University of Colorado – Boulder

University of Connecticut

University of Florida

University of Georgia

University of Houston

University of Illinois

University of Iowa

University of Kansas

University of Kentucky

University of Louisville

University of Maryland

University of Miami

University of Michigan

University of Minnesota

University of Mississippi

University of Missouri

University of Nebraska

University of North Carolina at Chapel Hill

University of Notre Dame

University of Oklahoma

University of Oregon

University of Pittsburgh

University of South Carolina

University of Southern California

University of Tennessee

University of Texas – Austin

University of Utah

University of Virginia

University of Washington

University of Wisconsin

Vanderbilt University

Villanova University

Virginia Tech

Wake Forest University

Washington State University

West Virginia University

Xavier University

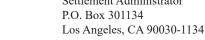
Case 4:20-cv-03919-CW Document 717-4 Filed 03/03/25 Page 25 of 96

Exhibit E

Case 4:20 GY-03919-CW Legal Notice

Document 717-4 Filed 03/03/25 Settlement Administrator

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This is an important notice about a class action settlement.

«Barcode»

Postal Service: Please do not mark barcode

ClaimID: << ClaimID>>

PIN Code: << PIN>>

NCCO: ClaimID: «ClaimID»

PIN: «PIN»

«First1» «Last1»

 $\langle\langle CO \rangle\rangle$

«Addr2»

«Addrl»

«City», «St» «Zip»

«Country»



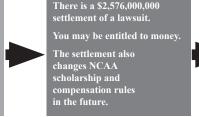
NCCO

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In re: College Athlete NIL Litigation
Case No. 4:20-cv-03919

Class Action Notice Authorized by the U.S. District Court

Were you a Division I college athlete at any time between 2016 and 2024 who was subject to NCAA scholarship and compensation rules?



To see how much money you may get, visit www.collegeathletecompensation.com on December 17, 2024.

Scan the QR code to learn about your rights and options.

Respond by January 31, 2025, if needed.

Key Things to Know:

- This is an important legal document.
- If you take no action, any ruling from the Court will apply to you, and you will not be able to sue the NCAA, or any of the Power Five Conferences, or their member institutions about the same issues.
- NCAA compensation rules are changing as part of this settlement. To understand how you are impacted, learn more at www.collegeathletecompensation.com or by scanning the QR code.

Case 4:20-cv-03919-CW Document 717-4 Filed 03/03/25 Page 28 of 96

Exhibit F

ClaimID: <<ClaimID>>

PIN: <<PIN>>

Dear <<First1>> <<Last1>>,

In re College Athlete NIL Litigation, Case No. 4:20-cv-03919-CW (N.D. Cal.)

If You Were a Division I College Athlete Between 2016 and 2024, You Could Get Money from a Class Action Settlement.

CLICK HERE TO FILE YOUR
CLAIM FORM

A federal court authorized this notice.

YOUR CLAIM ID	< <claimid>></claimid>					
YOUR PIN	<< PIN>>					
USE THESE UNIQUE NUMBERS WHEN FILING						
YOUR CLAIM FORM TO RECEIVE A CLASS PAYMENT.						

You are receiving this notice because school records indicate you are included in this class action settlement and may be eligible for a payment. To see how much money you could recover, and ensure you receive your payment, update your contact information and payment method at www.collegeathletecompensation.com and enter the Claim ID and PIN provided above. Estimated payments will be updated approximately 60 days from the date you receive this notice and will be dependent on the information your school provided to us.

What is this lawsuit about?

This lawsuit, *In re College Athlete NIL Litigation*, Case No. 4:20-cv-03919-CW (N.D. Cal.), claims that NCAA limits on the number and amounts of athletic scholarships available and NCAA limits on compensation and benefits that college athletes can receive for their athletic services and their names, images, and likenesses (NIL) violate the antitrust laws.

Are NCAA rules changing?

As part of the Settlement, Defendants have also agreed to change compensation rules going forward. Conferences and schools, starting in Fall 2025, may increase the number of athletic scholarships provided and may provide direct benefits for NIL and participation in college sports, up to an aggregate yearly amount set forth in the Settlement. These increased compensation opportunities may impact you if you compete as a college athlete beginning in Fall 2025. Also as part of the Settlement, NCAA rules regarding the payments that student-athletes will be permitted to receive from third parties for their NIL while remaining eligible to play Division I sports will be modified.

To see how compensation rules will be changed going forward, access a copy of the Settlement by visiting www.collegeathletecompensation.com.

Who is a part of the lawsuit?

You are a member of the Settlement Classes (i.e., a "Class Member") if:

- You received or will receive a full Grant-in-Aid scholarship and compete on, competed on, or will compete on a Division I men's basketball team or an FBS football team, at a college or university that is a member of one of the Power Five Conferences (including Notre Dame), and you have been or will be declared initially eligible for competition in Division I at any time from June 15, 2016 through September 15, 2024. This is referred to as the "Settlement Football and Men's Basketball Class."
- You received or will receive a full Grant-in-Aid scholarship and compete on, competed on, or will compete on a Division I women's basketball team at a college or university that is a member of the Power Five Conferences (including Notre Dame), and you have been or will be declared initially eligible for competition in Division I at any time from June 15, 2016 through September 15, 2024. This is referred to as the "Settlement Women's Basketball Class."
- You compete on, competed on, or will compete on a Division I athletic team and you have been or will be declared initially eligible for competition in Division I at any time from June 15, 2016 through September 15, 2024. This is referred to as the "Settlement Additional Sports Class."

• You compete on, or competed on, or will compete on a Division I athletic team at any time between June 15, 2020 through the end of the Injunctive Relief Settlement Term as defined in the Settlement. The Injunctive Relief Settlement Term is the ten (10) Academic Years following the date of Final Approval of the Settlement. This is referred to as the "Settlement Declaratory and Injunctive Relief Class."

What do I get?

Defendants have agreed to pay \$2,576,000,000 and change compensation rules going forward to end this lawsuit. You may be eligible to receive some of this money. The amount of money you get will depend on which class you are in and what you qualify for according to the below:

- Broadcast NIL payments will be a set, yearly amount for each Power Five FBS Football and Division I Basketball
 player based on the sport you competed in, the specific years played between 2016-2024, and the conference in
 which you competed. Payments will be equal for members competing in the same sport in the same conference in
 the same year. Broadcast NIL, defined by the lawyers in this case, refers to the use of an athlete's NIL via
 broadcasts like tv, radio, internet and other media.
- Videogame NIL payments will be a set, yearly amount for each athlete who competed in FBS Football or Division I Men's Basketball based on the number of years you competed between 2016-2024 and the number of claims filed by class members. Total payments to be shared equally each year among eligible athletes are based on a fixed percentage applied to estimated videogame revenue that would have occurred had a game been in existence each year.
- Payments for additional compensation for your athletic services will be based on the years you competed in
 Division I between 2019-2024, the sport you competed in, the school you competed for, and the number of claims
 filed by class members, among other criteria. For the athletes competing in Power Five Football or Basketball,
 payments will also be based on the scholarship you received and performance statistics, among other criteria.
- Lost NIL payments will be based on the amount of money you received from third parties for your NIL after July 1, 2021, the specific years you competed between 2016-2021, the sport you competed in, the school(s) you competed for, your performance statistics, and the number of claims filed by class members. "Lost NIL" refers to the lost opportunity to receive money from third parties for your NIL.

Your payment also depends on how much money the Court approves for attorneys' fees, class representative awards, and litigation and settlement costs. These payments, including attorneys' fees, will be paid out yearly over a ten-year period, with equal amounts paid each year.

How do I get money?

If you got this notice, and you received a full Grant-in-Aid Scholarship and played FBS Football, Division I Men's Basketball, or Division I Women's Basketball for a school that competes in a Power Five Conference (ACC, Big Ten, Big 12, Pac-12, SEC), you need to update only your contact information and preferred method of payment to get money. Then, you will automatically receive a payment if the settlement is approved and becomes final. To see an estimate of your payment amount or update your contact information and/or payment method, visit www.collegeathletecompensation.com.

If you (1) played a sport other than FBS Football or Division I Basketball, or received less than a full scholarship, at a school that is in a Power Five Conference (ACC, Big Ten, Big 12, Pac-12, SEC), or (2) competed in any sport for a school not within a Power Five Conference, you will need to complete a <u>Claim Form</u>.

If you received NIL compensation since July 1, 2021, and you competed prior to July 1, 2021, you can confirm your deal was reported by your school here, and then you will automatically receive payment if your contact information and payment method is updated. If your NIL deal was not reported by your school, you will need to file a claim form.

For more details about whether a claim form is required, visit www.collegeathletecompensation.com.

What are my rights?

If you do nothing, you will be bound by the Court's decisions, even if you do not receive a payment under the Settlement. If you want to keep your right to sue the settling Defendants, or their member institutions, instead of potentially getting money from this settlement, you must opt out by **January 31, 2025**. You cannot opt out of the future rule changes (injunctive relief), but you may object. Please note that if you opt out, you will not receive any money from this Settlement. If you want to stay in the Settlement but do not agree with any part of it, you may object to it by **January 31**,

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2025. Details about these options are available by clicking here or by going to www.collegeathletecompensation.com.

The Court will hold a hearing remotely and in person on **April 7, 2025**—this date is subject to change—to consider whether to approve the Settlement and a request for attorneys' fees and award for each of the class representatives. You or your own lawyer may request to speak at the hearing at your own expense by submitting a written objection to the Court electronically, by mail, or in person and indicating in the objection that you or your lawyer would like to speak at the hearing. The Court may not allow everyone who requests to speak an opportunity to do so, but to ensure that the Court considers your request to speak at the hearing, you must file a written objection indicating that you or your lawyer would like to speak at the hearing.

Please go to www.collegeathletecompensation.com for more detailed directions about where the hearing will be held in person and how you can access the hearing remotely, and about what to include in, and where to send, your objection. The website will also include the most updated time and date of the hearing, as will the docket for the case, which can be accessed at https://ecf.cand.uscourts.gov.

NOTE: The Settlement Agreement does not release the claims currently raised in the Complaint in *Choh v. Brown University, et al.*, No. 3:23-cv-00305-AWT (D. Conn.) ("*Choh*"), against the Ivy League and Ivy League member institutions ("*Choh* Defendants"), challenging an alleged agreement among the *Choh* Defendants not to award athletic scholarships or otherwise provide any compensation or education-related reimbursements for athletic services as permitted under then-applicable NCAA rules. The previously filed *Choh* claims arise out of unique aspects of rules applicable within the Ivy League alone. The Settlement Agreement and its release provisions otherwise fully apply to student-athletes who are in the Settlement Classes, including, but not limited to, Ivy League student-athletes, and likewise otherwise fully apply to Releasees as defined in the Settlement, which includes, but is not limited to, the Ivy League, Ivy League member institutions, and Defendants in this Action.

The Settlement Agreement also does not release the claims currently stated in the Complaint in *Johnson, et al. v. National Collegiate Athletic Association, et al.*, 2:19-cv-05230-JP (E.D. Pa.); claims under the Fair Labor Standards Act, 29 U.S.C.A. § 201 et seq. or any other federal labor laws, or claims under any analogous state labor laws; or claims under Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681 et seq., other than any claims arising out of or relating to the distribution of the Gross Settlement Fund.

You do not need to opt out of this Settlement in order to pursue remedies in the lawsuits listed above.

What if I received two notices?

If you received two notices by email and/or mail, NCAA records indicate that you are included in both this settlement and the *Hubbard v. National Collegiate Athletic Association* settlement, Case No. 4:23-cv-01593. You may be eligible to receive money from both settlements.

Go to www.collegeathletecompensation.com to file a Claim Form in both settlements, if required, for you to receive all the money you qualify for in both settlements.

Questions?

www.collegeathletecompensation.com admin@collegeathletecompensation.com 1-877-514-1777

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Exhibit G

ClaimID: <<ClaimID>>

PIN: <<PIN>>

Dear <<First1>> <<Last1>>,

In re College Athlete NIL Litigation, Case No. 4:20-cv-03919-CW (N.D. Cal.)

Hubbard v. National Collegiate Athletic Association, Case No. 4:23-cv-01593-CW (N.D. Cal.)

Time is running out for Division I Athletes to participate in class action settlements.

CLICK HERE TO CLAIM YOUR SHARE

YOUR CLAIM ID	< <claimid>></claimid>				
YOUR PIN	<< PIN >>				
USE THESE UNIQUE NUMBERS TO FILE YOUR CLAIM					

Division I Athletes have until January 31, 2025 to claim their share and receive a payment from one or both class action settlements. Forms may be submitted online at collegeathletecompensation.com.

If you have already participated online, then no further action is required at this time.

You must file a Claim Form at collegeathletecompensation.com to receive a settlement payment if:

- You are a Division I athlete other than a full grant-in-aid Power Five Football or Basketball player and you want to receive payments for participation in college sports;
- You are a Football or Basketball athlete not in the Power Five and you want to receive payment for videogames;
- You are a Division I athlete who competed in the same sport prior to and after July 1, 2021, and received an NIL deal after July 1, 2021 that has not been provided to Plaintiffs by your school (check www.collegeathletecompensation.com to find out if your deal was reported to Plaintiffs); or
- You competed on a Division I athletic team that was not a basketball team in the Big East or a team in the Power Five Conferences anytime during the 2019-2020, 2020-2021, or 2021-2022 academic years and you would have qualified for an academic achievement award at your school.

Payments under the settlements will be automatically made to athletes that played **if they provide current contact information and a preferred payment method at <u>collegeathletecompensation.com</u>:**

- Power Five FBS Football and Men's Division I Basketball athletes who received a full grant-in-aid for broadcast NIL awards, videogame NIL awards, athletic services awards, and awards for lost third-party payments for NIL (if NIL deal information has been provided to Plaintiffs by their school);
- Power Five Women's Division I Basketball athletes who received a full grant-in-aid for broadcast NIL awards, athletic services awards, and awards for lost third-party payments for NIL (if NIL deal information has been provided to Plaintiffs by their school); and
- Any Division I athlete who competed in the same sport prior to and after July 1, 2021, and received NIL payments from a third party after July 1, 2021, and information about those payments has been provided to Plaintiffs by their school.
- All Power Five athletes and Big East Basketball athletes who competed on a team anytime during the 2019-2020, 2020-2021, or 2021-2022 academic years.

Questions can be sent to admin@collegeathletecompensation.com

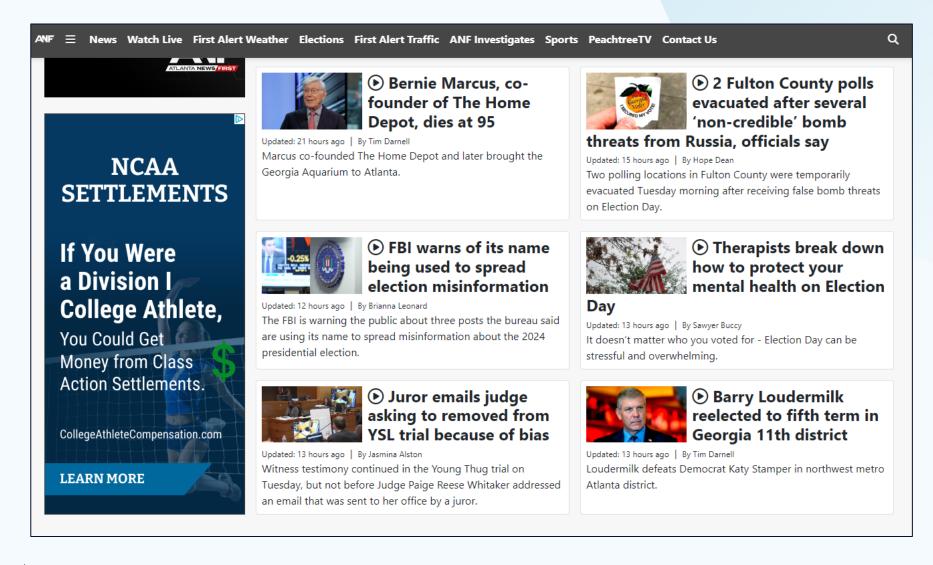
Exhibit H

Digital Media PoP



In re: College Athlete NIL Litig. and Hubbard v. NCAA

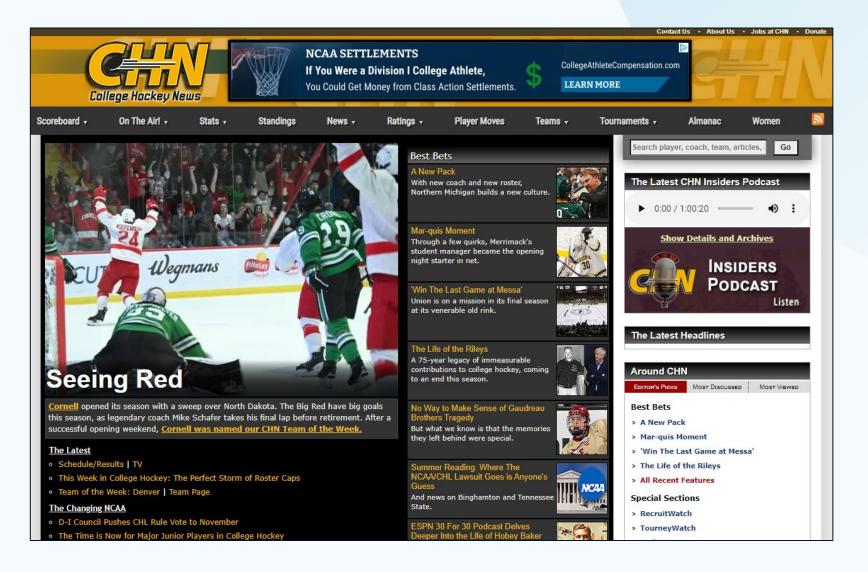
AtlantaNewsFirst.com | 300x600





veritaglobal.com

CollegeHockeyNews.com | 728x90

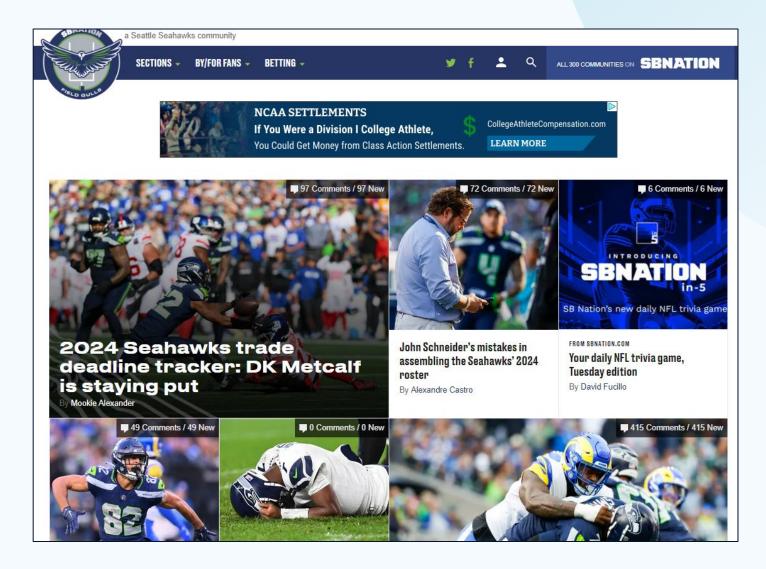




veritaglobal.com

3

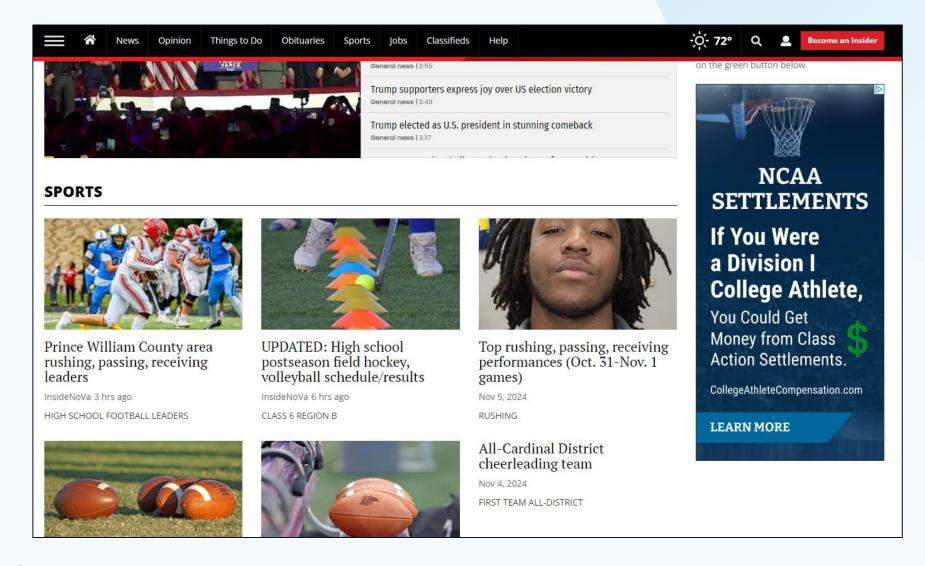
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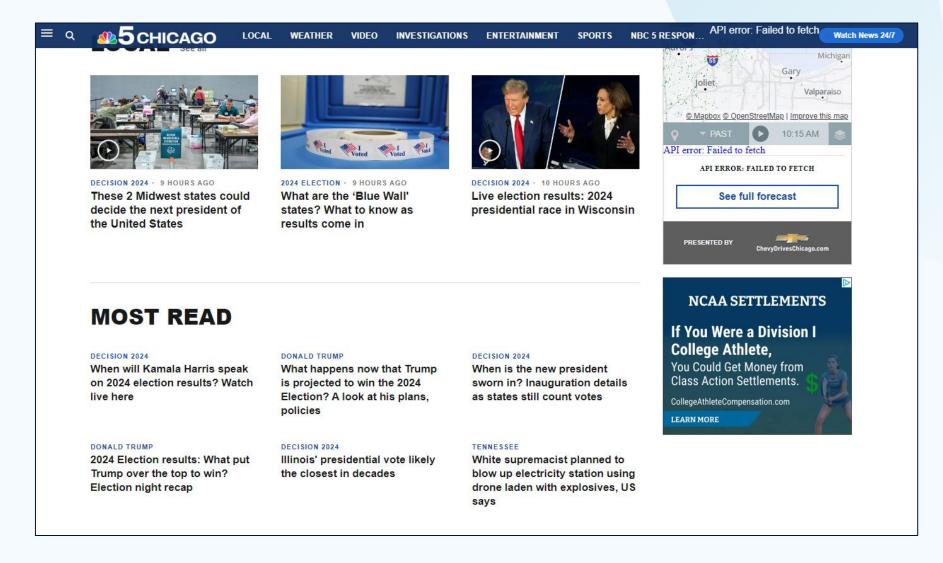
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InsideNOVA.com | 300x600



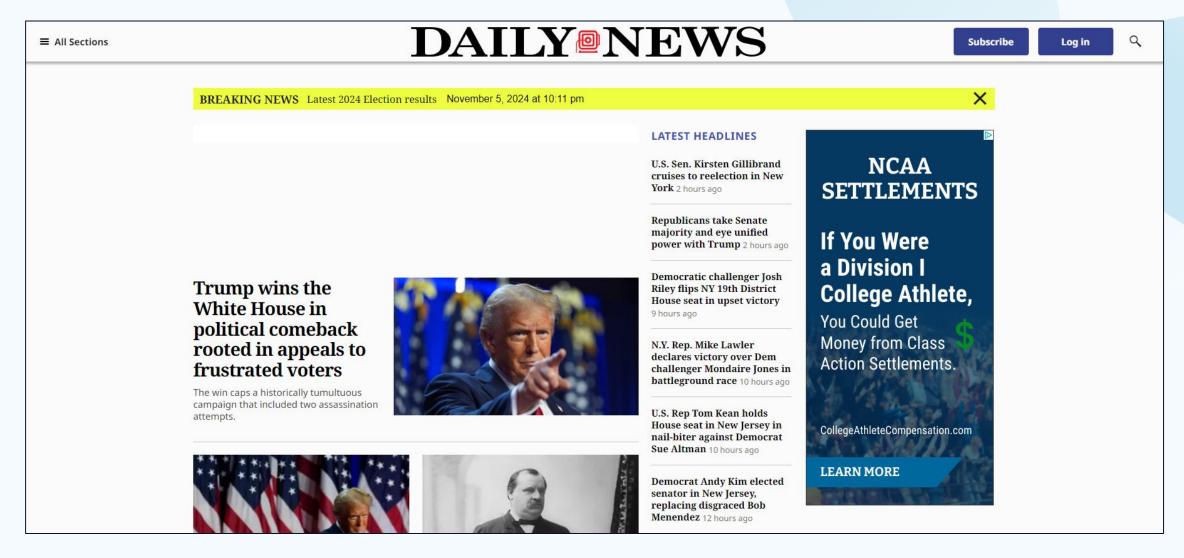


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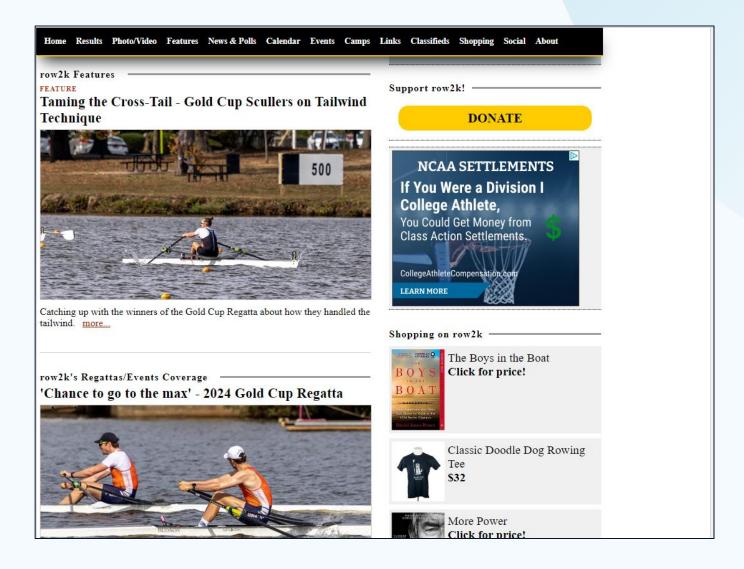


NYDailyNews.com | 300x600

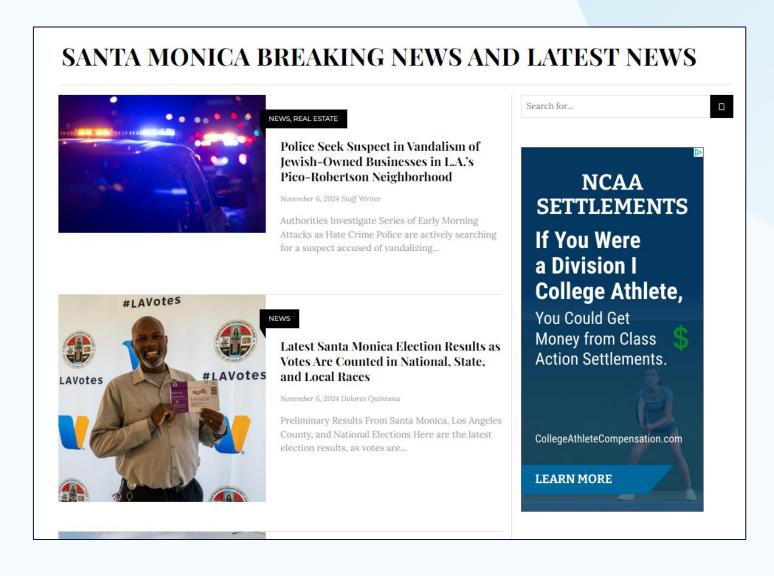




Row2K.com | 300x250









USATF.org | 300x250



NOVEMBER 04 2024

Rodenfels defends title, Muhumed wins second USATF title of the year at USATF 5 km Championships



OCTOBER 31 2024

Defending Champions Beadlescomb, Rodenfels Expected to be Challenged at USATF 5 km Championships



OCTOBER 31 2024

Masters Athletes Set to Run on the Front Range of the Rockies at the USATF Masters 5 km Cross Countr



OCTOBER 30 2024

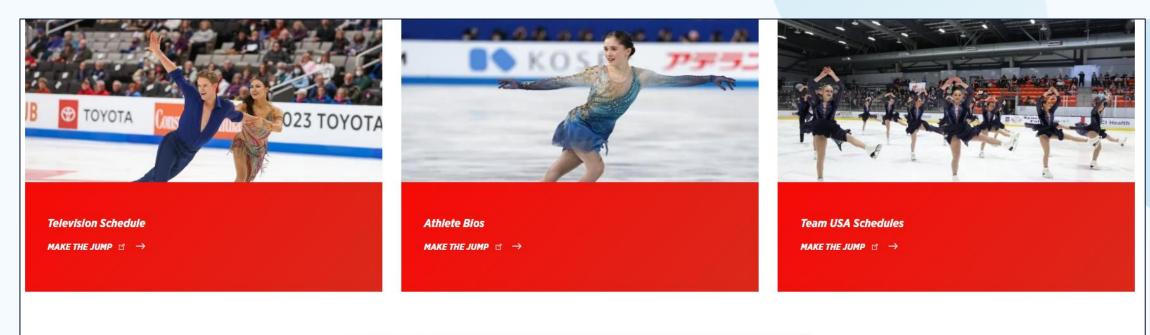
U.S. Paralympics Track & Field Program Joins USA Track & Field

VIEW MORE NEWS





USFigureSkating.org | 728x90

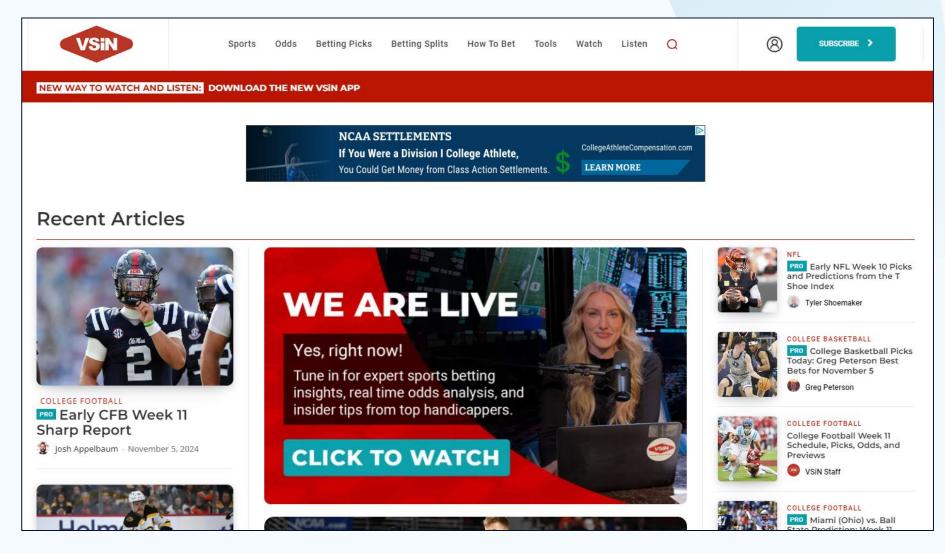




A SKATER'S JOURNEY



VSiN.com | 728x90

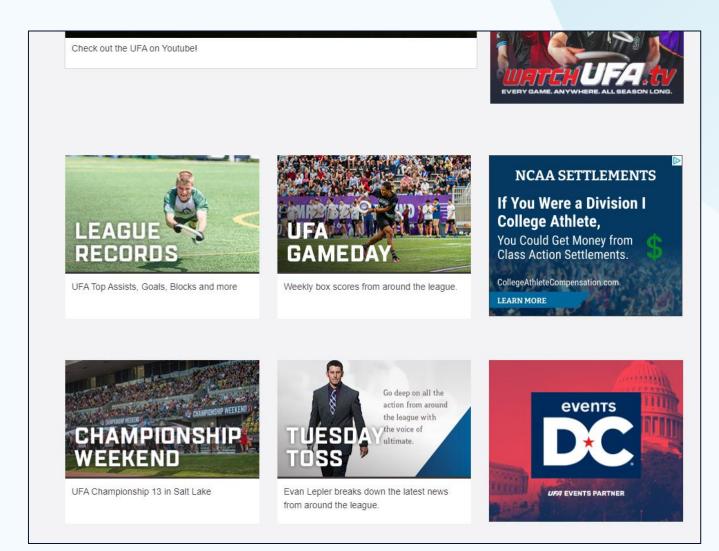




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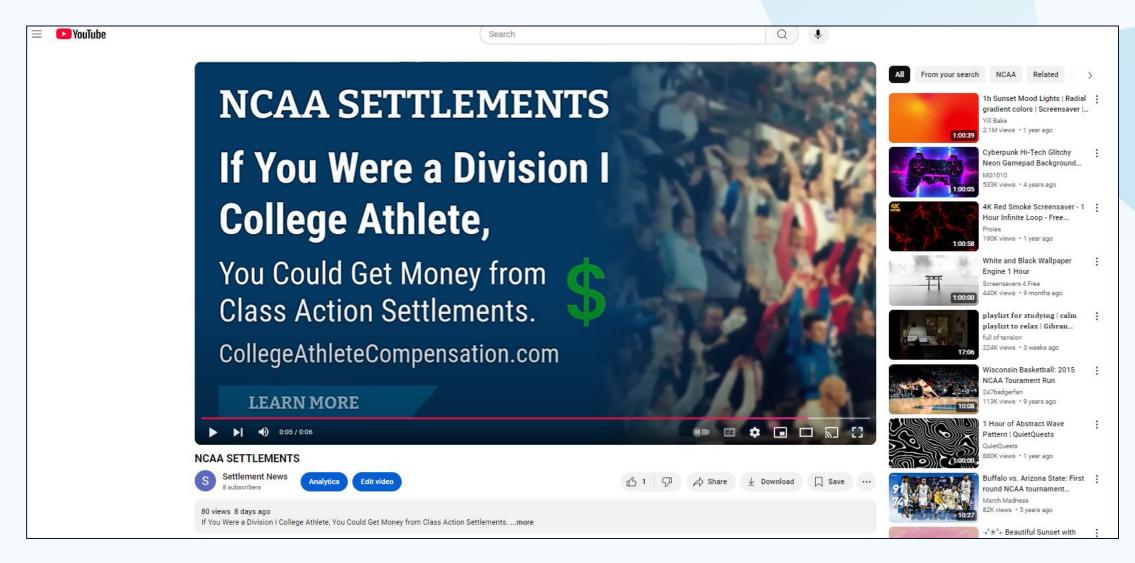
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WatchUFA.com | 300x250





YouTube.com | 6s video

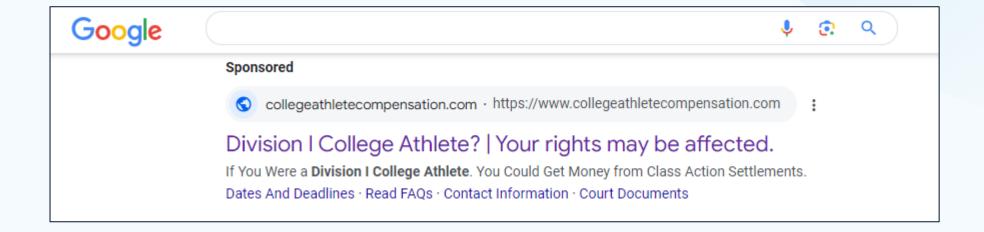




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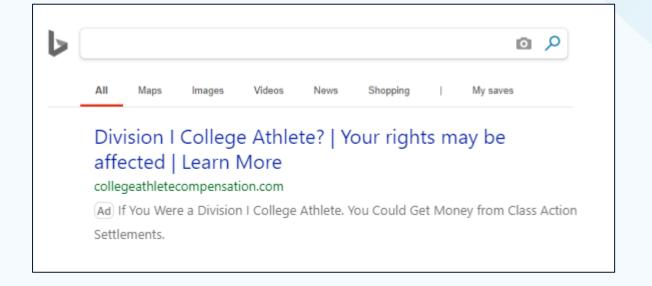
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Google Search | Text Ad



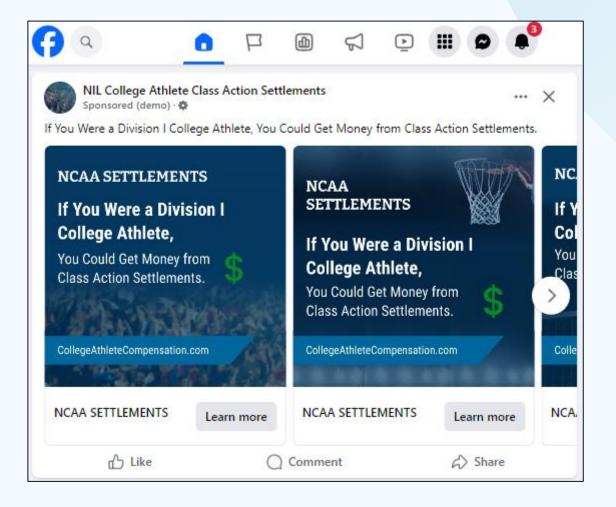


Bing/Yahoo Search | Text Ad



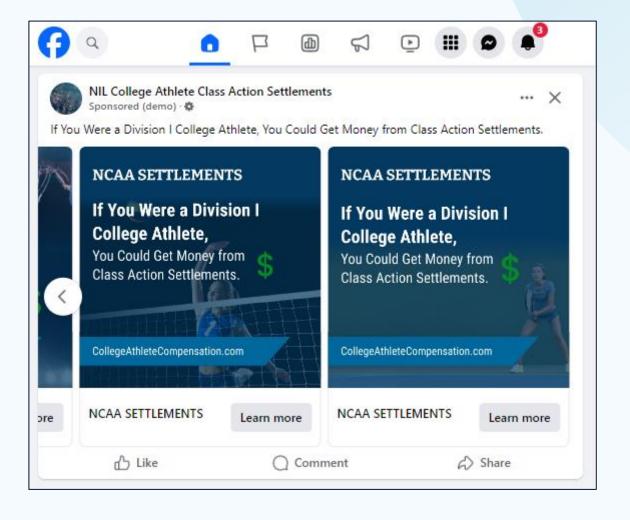


Facebook Feed | Desktop





Facebook Feed | Desktop





















Facebook Feed | Stories





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Facebook Feed | Stories





Facebook Feed | Stories

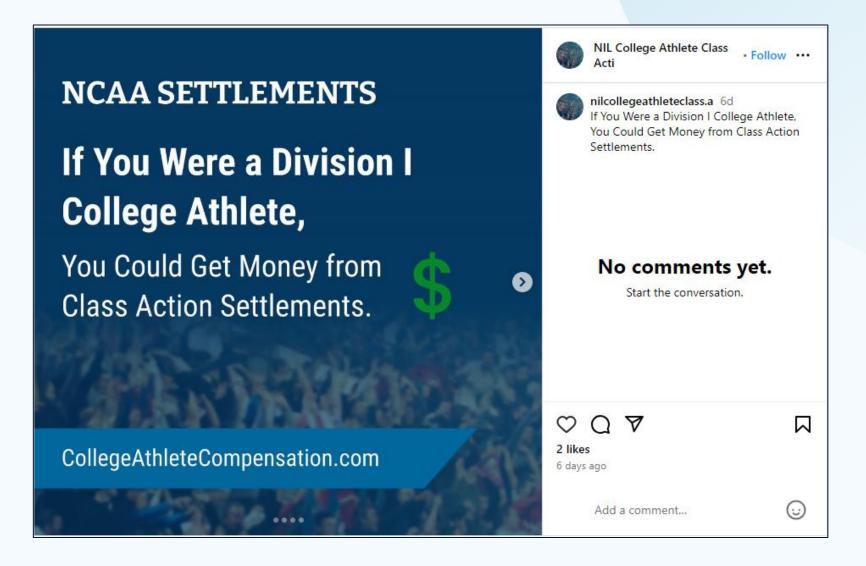




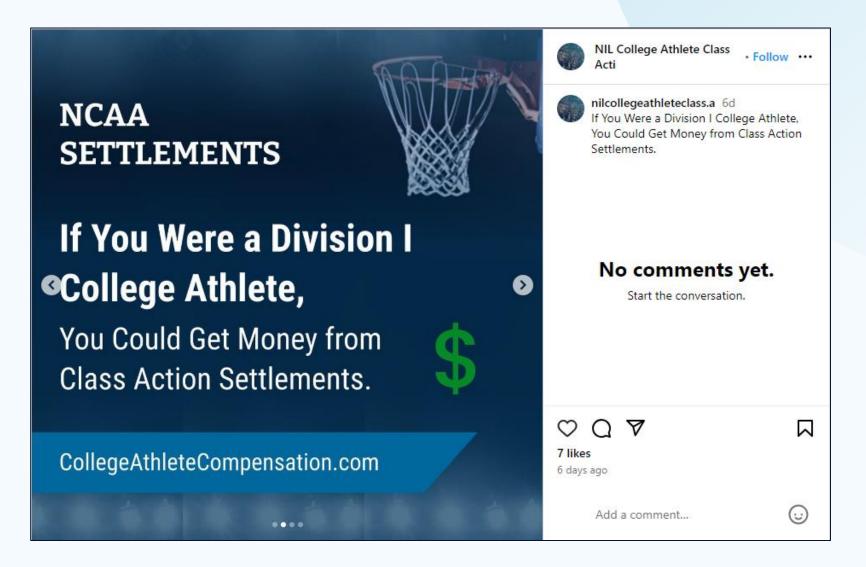
Facebook Feed | Stories



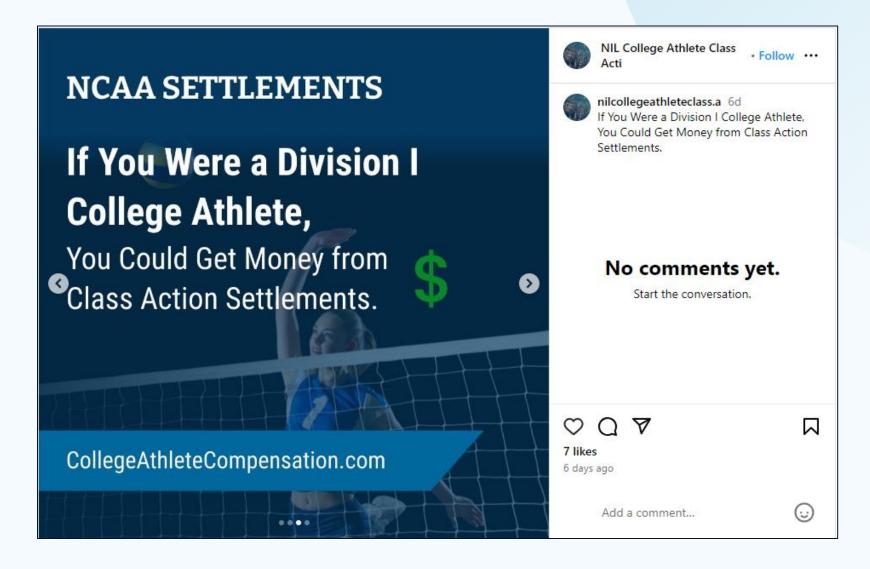




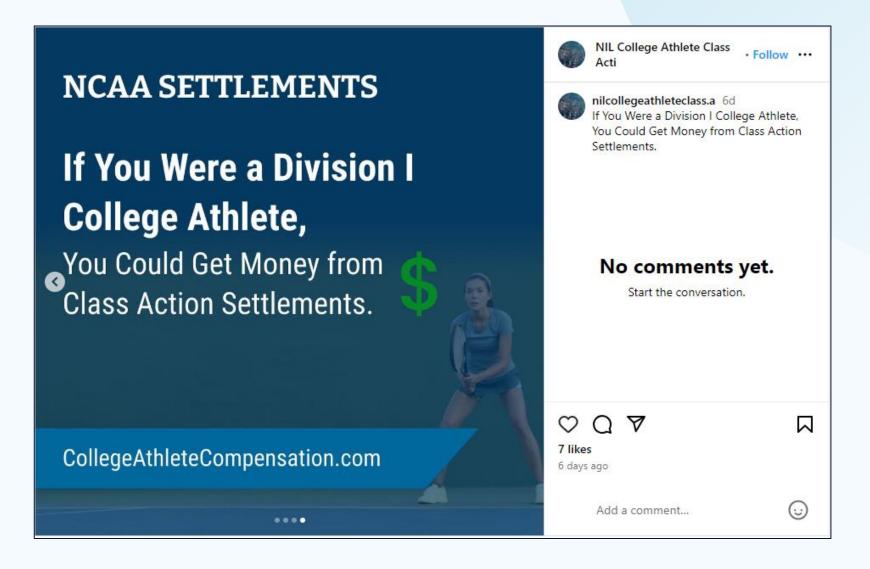




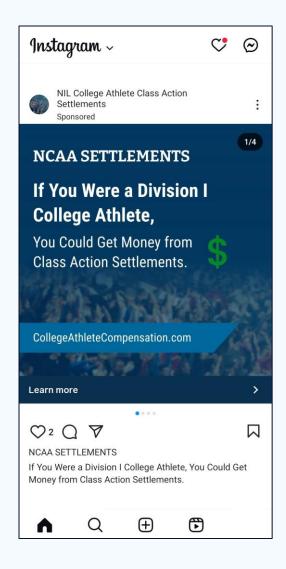
































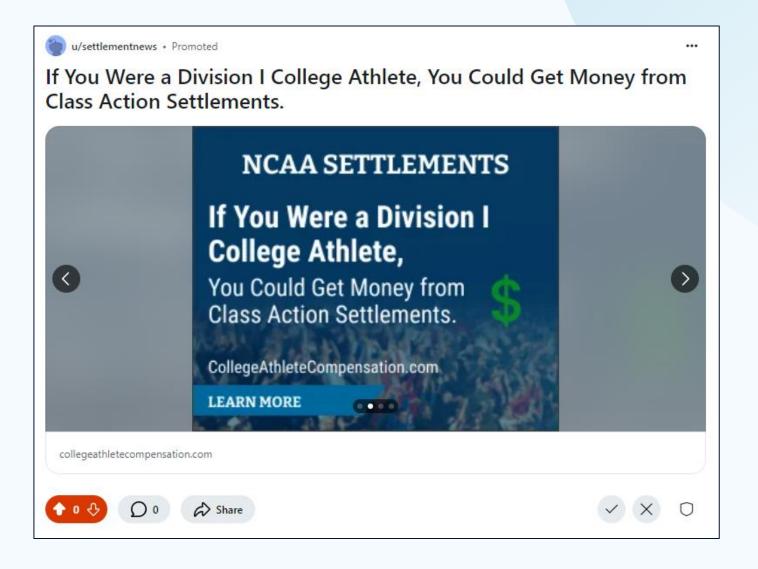








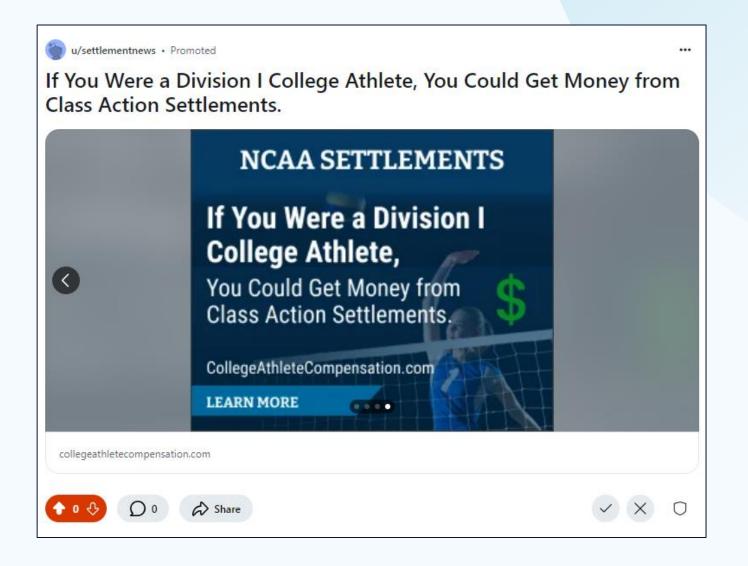




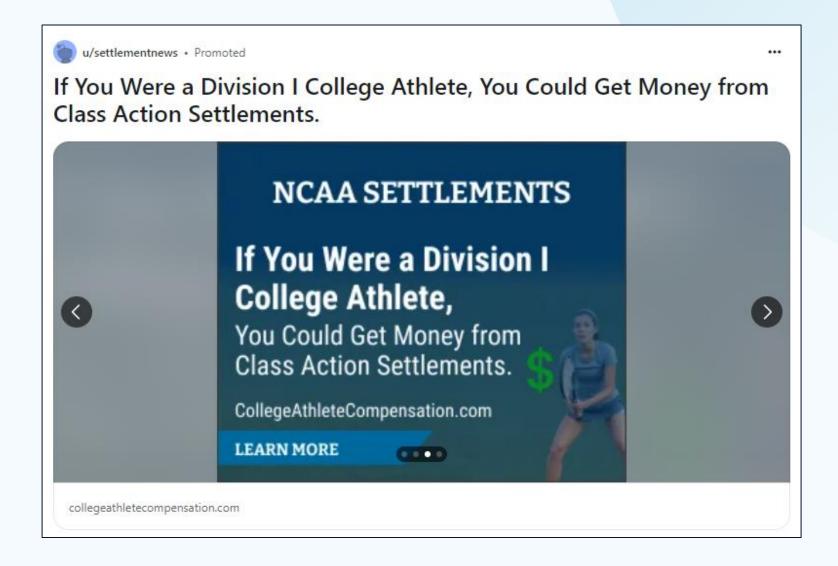












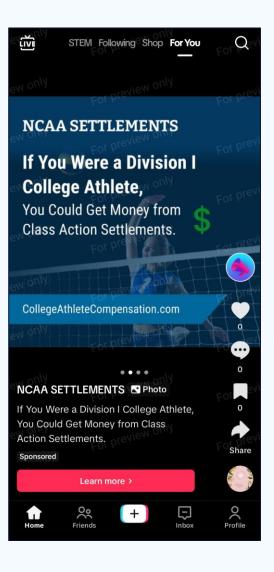




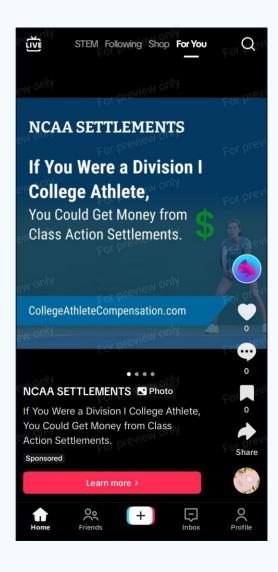














Case 4:20-cv-03919-CW Document 717-4 Filed 03/03/25 Page 81 of 96

Exhibit I

Division I Athletes may be eligible for money from class action settlements

NEWS PROVIDED BY
Hagens Berman Sobol Shapiro LLP and Winston & Strawn LLP →
Oct 18, 2024, 22:00 ET

SAN FRANCISCO, Oct. 18, 2024 /PRNewswire/ -- The following statement is being issued by Hagens Berman Sobol Shapiro LLP and Winston & Strawn LLP:

Settlements have been reached in class-action lawsuits, *In re College Athlete NIL Litigation*, Case No. 4:20-cv-3919 and *Hubbard v. National Collegiate Athletic Association*, *et al.*, Case No. 4:23-cv-01593, alleging the NCAA and Power Five Conferences broke antitrust laws by agreeing not to provide benefits and compensation to college athletes for their participation in college sports or for the use of their names, images and likenesses (NIL), agreeing to limit scholarships and scholarship amounts, and agreeing not to provide college athletes academic achievement awards.

"NCAA college athletes have waited decades for this moment, and their right to receive the full value of their hard work has finally arrived," said Steve Berman, managing partner and co-founder of Hagens Berman. "We are incredibly proud to be in the final stages of historic change."

You may be included in one or both of the settlements and be entitled to money or other benefits if (1) you competed on a Division I athletic team and were declared initially eligible for competition at any point from June 15, 2016 to Sept. 15, 2024, and/or (2) you competed on a Division I athletic team any time between April 1, 2019, and September 15, 2024, and you would have qualified for an academic achievement award at your school, and/or (3) you will compete as a Division I athlete beginning in Fall 2025.

Case 4:20-cy-03919-CW Document 717-4 Filed 03/03/25 Page 83 of 96 Complete descriptions of the settlement classes are available at www.collegeathletecompensation.com.

Payments under the settlements will be automatically made to:

- Power Five FBS Football and Men's Division I Basketball athletes who received a full grant-in-aid for broadcast NIL awards, videogame NIL awards, athletic services awards, and awards for lost thirdparty payments for NIL (if NIL deal information has been provided to Plaintiffs by their school);
- Power Five Women's Division I Basketball athletes who received a full grant-in-aid for broadcast NIL awards, athletic services awards, and awards for lost third-party payments for NIL (if NIL deal information has been provided to Plaintiffs by their school); and
- Any Division I athlete who competed in the same sport prior to and after July 1, 2021, and received NIL payments from a third party after July 1, 2021, and information about those payments has been provided to Plaintiffs by their school.
- All Power Five athletes and Big East Basketball athletes who competed on a team anytime during the 2019-2020, 2020-2021, or 2021-2022 academic years.

You must file a Claim Form to receive a settlement payment if:

- You are a Division I athlete other than a Power Five Football or Basketball player and you want to receive payments for participation in college sports;
- You are a Football or Basketball athlete not in the Power Five and you want to receive payment for videogames;
- You are a Division I athlete who competed in the same sport prior to and after July 1, 2021, and
 received an NIL deal after July 1, 2021 that has not been provided to Plaintiffs by your school (check
 www.collegeathletecompensation.com to find out if your deal was reported to Plaintiffs); or
- You competed on a Division I athletic team that was not a basketball team in the Big East or a team in the Power Five Conferences anytime during the 2019-2020, 2020-2021, or 2021-2022 academic years and you would have qualified for an academic achievement award at your school.

Review your estimated payment amount December 17, 2024 at www.collegeathletecompensation.com and file a Claim Form if one is required for you to receive all the money you qualify for. For more information about whether a claim form is required, go to www.collegeathletecompensation.com.

If you have not received information via email, check your school email account or file a Claim Form online.

Claim Forms may be submitted online or printed and mailed to the Settlement Administrator by January 31, 2025.

In addition, student-athletes who did, do, or will compete on a Division I athletic team anytime between June 15, 2020 and the end of the Injunctive Relief Settlement Term, which will end ten years after the Settlement is approved, may benefit from changes to NCAA and conference rules that will allow schools and conferences to provide to athletes direct benefits and compensation for NIL and participation in college sports, and additional benefits over and above annual existing scholarships and all other benefits currently permitted by NCAA rules, up to an aggregate yearly amount specified in the Settlement.

Complete details regarding these additional benefits, and other changes that will be made to NCAA rules about benefits and compensation, including NIL payments from third parties, are provided in the Injunctive Relief Settlement, available at www.collegeathletecompensation.com.

Winston's Co-Executive Chairman Jeffrey L. Kessler, who also negotiated the class- action settlements that created the free agency systems for athletes in the NFL and the NBA, said, "We're pleased to take this next step towards finalizing this historic, industry-changing settlement that will provide a fair system of revenue sharing for the college athletes who generate hundreds-of-millions-of-dollars for their schools. For far too long, these athletes have been deprived of their economic rights in an unjust system that will now, finally, be fundamentally reformed. The new system will allow athletes to be fairly rewarded for their contributions and college sports will continue to thrive."

SOURCE Hagens Berman Sobol Shapiro LLP and Winston & Strawn LLP

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Exhibit J

Time is running out for Division I Athletes to participate in class action settlements

SAN FRANCISCO, January 21, 2025 /PRNewswire/ -- Division I Athletes have one more week to file a Claim Form or provide their contact/payment information in the *In re College Athlete NIL Litigation* and *Hubbard v. National Collegiate Athletic Association* settlements, announces Hagens Berman Sobol Shapiro LLP and Winston & Strawn LLP.

Division I Athletes have until January 31, 2025 to file a Claim Form, or submit contact information and a preferred payment method, to receive a payment from one or both class action settlements. **Information must be submitted online at collegeathletecompensation.com.**

Payments under the settlements will be automatically made to the following athletes who have updated their contact information and payment method:

- Power Five FBS Football and Men's Division I Basketball athletes who received a full grant-in-aid for broadcast NIL awards, videogame NIL awards, athletic services awards, and awards for lost third-party payments for NIL (if NIL deal information has been provided to Plaintiffs by their school);
- Power Five Women's Division I Basketball athletes who received a full grant-in-aid for broadcast NIL awards, athletic services awards, and awards for lost third-party payments for NIL (if NIL deal information has been provided to Plaintiffs by their school); and
- Any Division I athlete who competed in the same sport prior to and after July 1, 2021, and received NIL payments from a third party after July 1, 2021, and information about those payments has been provided to Plaintiffs by their school.
- All Power Five athletes and Big East Basketball athletes who competed on a team anytime during the 2019-2020, 2020-2021, or 2021-2022 academic years.

You must file a Claim Form to receive a settlement payment if:

- You are a Division I athlete other than a Power Five full grant-in-aid Football or Basketball player and you want to receive payments for participation in college sports from 2019-2024;
- You are a Football or Men's Basketball athlete not in the Power Five and you want to receive payment for videogames from 2016-2024;
- You are a Division I athlete who competed in the same sport prior to and after July 1, 2021, and received an NIL deal after July 1, 2021 that has not been provided to Plaintiffs by your school (check www.collegeathletecompensation.com to find out if your deal was reported to Plaintiffs); or

• You competed on a Division I athletic team that was not a basketball team in the Big East or a team in the Power Five Conferences anytime during the 2019-2020, 2020-2021, or 2021-2022 academic years and you would have qualified for an academic achievement award at your school.

Payments are the result of settlements reached in class-action lawsuits alleging the NCAA and Power Five Conferences broke antitrust laws by agreeing not to provide benefits and compensation to college athletes for their participation in college sports or for the use of their names, images and likenesses (NIL), agreeing to limit scholarships and scholarship amounts, and agreeing not to provide college athletes academic achievement awards.

"We strongly encourage NCAA college athletes to participate before time runs out. They have waited far too long to reap the benefits of this historic, industry-changing settlement." said Steve Berman, managing partner and co-founder of Hagens Berman and Jeffrey L. Kessler, Winston's Co-Executive Chairman.

SOURCE Hagens Berman Sobol Shapiro LLP and Winston & Strawn LLP

Media contact (press only): Steve Berman (<u>steve@hbsslaw.com</u>), Jeffrey Kessler (jkessler@winston.com)

Exhibit K



College Athlete Compensation Settlement

Opt Outs - House

		opt outs Trouse	
	Count 343		
	ClaimID	First1	Last1
1	10185748201	AARON	HOLIDAY
2	10183380501	AARON	SABATO
3	9000008601	AARON	SCHUNK
4	10064367001	AARON DEVON	EPPS
5	10575357901	AARON JOSHUA	NESMITH
6	10298903501	AASHARI	CROSSWELL
7	10266507201	ABIGAIL	HOOD
8	10168453801	ABIGAIL	SIMINSKI
9	10169368001	ADAM	KUNKEL
10	10095957001	ADDISON	OOMS
11	10264966201	ADRIAN	DEL CASTILLO
12	10132544701	AIDAN	ROBBINS
13	10105793301	AKAYLEB AI	EVANS
14	10117632601	ALARIC	JACKSON
15	10624939301	ALERICK	SOULARIE
16	10132110701	ALEVA	HIFO
17	10293841601	ALEX	FONTENOT
18	10327506001	ALEX JEFFREY	HORNIBROOK
19	10429454101	ALEXANDER	BACHMANN
20	10072300701	ALEXANDER CARL	SHAW
21	10301716101	ALEXANDER JORDAN	PERRY
22	10059430001	AL-MALIK	HAUSMAN
23	10551825601	AMANI	ORUWARIYE
24	20000646501	AMARI	CATCHINGS
25	9000045201	AMARVEER	SINGH
26	10272678401	AMBER C	MELGOZA
27	10132381501	AMMON	HANNEMANN
28	9000013601	ANDREW	ABBOTT
29	10105591201	ANDREW STEPHEN	LOCK
30	20001783101	ANTHONY	GILL
31	10174446801	ANTHONY	GOULD
32	10059595901	ANTHONY	PANDY
33	10266685401	ASA	LACY
34	10138756801	AUSTIN	SEIBERT

35	10670843001	AUSTIN CEDRIC	MONTGOMERY
36	10073653101	AVA JOYCE	ANDERSON
37	10130570901	AZEEZ O	OJULARI
38	10132309801	BAYLOR	ROMNEY
39	10122106001	BELLA SARA KRISTIANA	FISCO
40	10132370001	BENJAMIN	BYWATER
41	60013067301	BENJAMIN	RICHARDSON
42	10081666601	BENJAMIN JAMES	BOULWARE
43	10132377301	BLAKE	FREELAND
44	10132286001	BRACKEN	EL-BAKRI
45	10264683101	BRADLEY	KAAYA
46	9000044001	BRADY	MCCONNELL
47	10215885001	BRADY	OCONNELL
48	10132091701	BRAYDEN	ELBAKRI
49	10264679001	BREVIN	JORDAN
50	10292247001	BRITTANY	BREWER
51	10423123301	BRYCE P	LOVE
52	10672726601	BRYCE RAYMOND	NZE
53	10406819001	CADE MICHAEL	MCNAMARA
54	10289394901	CADE P	CUNNINGHAM
55	10093737801	CADEN	HAWS
56	9000004501	CAITLIN S	DRISCOLL
57	10138853601	CALEB	WILLIAMS
58	10074765601	CAMERON	ECHOLS-LUPER
59	10098444701	CAMERON	KRUTWIG
60	10089020901	CAMERON	TAYLOR BRITT
61	10577546001	CAMERON	VALLADARES
62	10271516601	CAMERON DAVID	SERIGNE
63	10256068701	CAMERON JAMES	RISING
64	10146449601	CARMEN ALEXANDER	MLODZINSKI
65	10266372501	CARSON	GREEN
66	50004102401	CARTER	CUNNINGHAM
67	10267690201	CASSIUS JEROME	STANLEY
68	10279788201	CAYDEN B	WALLACE
69	10107554601	CHAD	KELLY
	10115364801	CHARLES	MATTHEWS
71	10131242801	CHARLES KENT	WOERNER
72	10265213201	CHARLESTON	RAMBO
	9000037401	CHASE	STRUMPF
	10132279301	CHAZ	AH YOU
	10183911001	CHAZZ	SURRATT
	10147798301	CHLOE LEE	KITTS
	9000011001	CHRIS	MCMAHON
	10119475401	CLEVELAND ALAN	JACKSON
	10181757501	COLBY	PARKINSON
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80	10267103501	COLTON	PRATER
81	10244072401	CONNOR FRANCIS	PRIELIPP
82	10304358501	CORNELIS	VAN EYK
83	9000012301	CURTIS	WEAVER
84	10264461501	DAMUZHEA	BOLDEN
85	10072106001	DANIEL VIRGIL	MILLS
86	10119482101	DAVID	BELL
87	9000022701	DAVIS MCKEE	WENDZEL
88	10132342601	DAX	MILNE
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90	10292504501	DEMARCUS	FIELDS
	10535880001	DEMETRIS	HARRIS
	10248268801	DENZEL R	MIMS
	10259482001	DEONTAY	ANDERSON
	10399792101	DEREK	CULVER
	10617204901	DERRICK	BARNES
	10292998101	DERRICK	WHITE
	10068863901	DESTINY	SLOCUM
	10031731501	DIBAJI	WALKER
	9000039001	DIXIE	WOOTEN III
	9000033001	DONELL	PASTER
	10406872301	DONOVAN	PEOPLES-JONES
	10461244701	DONOVAN JOHN	CLINGAN
-	10115393401	DONTAIE	ALLEN
	60013159901	DONTE	INGRAM
	10081682401	DORIAN SCOTT	ODANIEL
	10174134001	DREW	EUBANKS
	10407075401	DUNCAN	ROBINSON
-	10243871701	DYLAN M	SMITH
	10132258601	EARL	MARINER
			BURROLA
	10577020601	EDGAR	
	10022943801	ELIJAH	BLADES
	10682167201	ELIZA	EKSTRAND MEZZIO
	10265601001		
	10088111701	EMMA	ROWLAND
	10669726201	EMMALINE M	EKSTRAND
	10096015701	ERIC	STRIKER
	10108474201	ERICK	HALLETT
	10427953901	ERICK BERNARD	NEAL
	10584208401	ERIK	STEVENSON
_	10585939401	EVERETT	HUNTER
	10236602001	FILIP	PETRUSEV
	10282698501	FRANK	MASON
	10407087001	FRANZ JACOB	WAGNER
	10138382401	GABE	BRKIC
125	10093788301	GABREYL SALE AH YOU	SUMMERS

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126	10093002501	GAVIN	CROSS
127	10558999801	GRANT	HALEY
128	10301568101	GREGORY MICHEAL	FRANCIS
129	9000023001	GRIFFIN	CONINE
130	10132347501	GUNNER	ROMNEY
131	9000040901	HANNAH	CROFUT
132	10132299901	HARRIS	LACHANCE
133	10297108001	HARRY	ALLEN
134	10228253501	HASAHN	FRENCH
135	10670832601	HASHEM	ASADALLAH
136	10132254901	HAYDEN	LIVINGSTON
137	10148109301	HAYDEN RANDLE	HURST
138	10308612201	HAYDEN THOMAS	HOWERTON
139	10176924601	HUNTER	LONG
140	10059357401	HUNTER ALEXANDER	ECHOLS
141	10113611001	HUNTER HARKINS	BARCO
142	10407039001	HUNTER RYAN	DICKINSON
143	10641051901	IKEM	OKEKE
144	10132393101	ISAAC	REX
145	10132134001	ISAIAH	KAUFUSI
146	50004112101	ISHMAEL	HYMAN
147	10132337201	JACKSON	KAUFUSI
148	10272933501	JACOB	BROWNING
149	10273003901	JACOB	EASON
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151	50018889001	JACOB	HUFF
152	10181975401	JACOB	LOWE
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156	10561625401	JACOB THOMAS-MICHAEL	COX
157	TBD	JAIME	JAQUEZ JR
	10271230001	JAKE MATTHEW	BENZINGER
	10259328001	JAMAL	SHEAD
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	10338679801	JAMES K	BLACKMON
	10115744701	JAMES LANDON	YOUNG
	10168550601	JAMISON ATHENS	GORDON
	10266489401	JARED	HOCKER
	10132296301	JARED	KAPISI
	10558965201	JASON	CABINDA
	9000007301	JASON	PRESTON
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Τ\U	100/1925101	JAWON CORTEZ	JOHNSON

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172	10174287301	JAYDON	GRANT
173	10107952701	JAYLON	ROBINSON
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175	10278942301	JEREMIAH J	LEDBETTER
176	10399801901	JERMAINE	HALEY
177	10119661101	JERRON NEHEMIAH	CAGE
178	10072511901	JIMMY	BELL
179	10271615801	JOHN	COLLINS
180	10115270001	JOHN	RHODES
181	10411288801	JOHN MICHAEL	SCHMITZ
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183	10271590701	JOHN THOMAS	WOLFORD
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	10132154501	JONATHAN	LINEHAN
	10624822401	JORDAN	BECK
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	10181709501	JOSE	ARCEGA-WHITESIDE
	TBD	JOSH	SMITH
	10323348901	JOSH JAMES	WHYLE
	10115747201	JOSHUA	ALI
	10160109801	JOSHUA ANDREAS	PIERRE-LOUIS
	10064645101	JOSHUA NOAH	GRAY
	10297394501	JULIUS	BRENTS
	10132444301	JUSTEN DEAN	SMITH
	20000008901	JUSTIN	RAGIN
	9000042401	KAHLIL	JOHNSON
	10119512601	KAMERON DREW	WILLIAMS
	10168563401	KARISSA ROSE	QUENICHET
	10095954401	KATELYN	OHASHI
	10118798101	KATHLEEN	DOYLE
	10182876701	KATHRYN	MEYER
	10288431601	KATHRYN E	WESTBELD
	10267399801	KEATON	SUTHERLAND
	10132232001	KEENAN	ELLIS
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	10419992101	KELLAN	GRADY
	10181753801	KEVIN	COSTELLO
	10266791301	KEVIN	MARFO
	10174670201	KEVIN TYLER	ABEL
	10576958701	KHALIL	TATE
	9000035901	KHYRI	THOMAS
	9000033901	KRISTOPHER FARRELL	JENKINS
∠1ρ	10354769101	KYLA	ROSS

047	10071000701	IZZZI INI TATAZZIANI	11111
	10071888701	KYLIN JATAVIAN	HILL
	10228833101	LAMONT	EVANS
	10248828901	LAUREN	COX
	10081650201	LOGAN JAMES	TISCH
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223	10098639001	LUCAS	WILLIAMSON
224	10115486001	MADELYNNE	SCHERR
225	10354757501	MADISON	KOCIAN
226	10139005101	MAGGIE	NICHOLS
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228	10661535001	MALIQUE	JACOBS
229	10119518701	MARC CRANDALL	LOVING
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232	9000038701	MARCUS	WALLACE II
233	10280054601	MARCUS ANDREW	ZEGAROWSKI
234	10168636501	MARGARET MARY	OTOOLE
235	9000026801	MARQUES	TOWNES
236	10132401701	MASEN	WAKE
237	10671858701	MASON	MOSES
238	10357112701	MASSIMILIANO C	BORGHI
239	10304146101	MATHEU	NELSON
240	10624048101	MATTHEW	BUTLER
241	10308323601	MATTHEW	CROSS
242	10185683001	MATTHEW	MCLAIN
243	10607526301	MAURICE	ODUM
244	10535918001	MEKHI	LAPOINTE
245	60004611701	MICAH	PARTEN
246	60004638901	MICHAEL	HARLEY
247	10132397901	MICHAEL	TANUVASA
248	10671862901	MICHAEL	VAN RAAPHORST
249	10577147801	MICHAEL	WILEY
250	10181802601	MICHAEL	WILSON
		MICHAEL DONOVAN	
251	10119848601	ALEXANDER	JORDAN
252	10168421601	MICHAEL LOGAN	MENNING
253	10185813901	MICHAELA NNE	ONYENWERE
254	10095968401	MIKAYLA	PIVEC
255	10282996201	MONTELL H	COZART
	10186277501	MORRELL ALEXANDER	OSLING III
	10294012501	MYA	HOLLINGSHED
	10138565101	MYKEL	JONES
	10131645801	NAKOBE RASHOD	DEAN
	20000942801	NATE	SAVINO
	10399777501	NATHAN	ADRIAN

262	10183413501	NATHANIEL	BRITT
263	10225092301	NATHANIEL	PIERRE-LOUIS
264	10064572001	NAZREON NYRU	REID
265	60016300801	NICHOLAS	DINARDI
266	10335992801	NICHOLAS	SWINEY
267	10071770601	NICHOLAS DYLAN	FITZGERALD
268	10249039901	NICHOLAS J	LOFTIN
269	10390868701	NIGEL	JOHNSON
270	10551039701	NKOSI	PERRY
271	10264308801	NYSIER	BROOKS
272	10168639001	OWEN WILLIAM	SCHWEBACH
273	10119745701	PALAIE TOFAU	GAOTEOTE
274	10125674701	PARKER	MESSICK
275	10169921901	PAUL	STAMM
276	10139462701	PAYTN BLISS	MONTICELLI
277	10168582801	QUINCI GRACE	THOMAS
278	10406853001	QUINN RICHARD	NORDIN
279	10228421001	RASHAD	WILLIAMS
280	10406638601	RASHAN ABDUL	GARY
281	9000043701	RASHARD	DAVIS
282	10076433201	RILEY	CORNELIO
283	10123600101	ROMANE JOELLE	LONGUEVILLE
284	10200954501	ROMAR	REID
285	9000010801	RYAN	ROLISON
286	10627241001	RYAN ALAN	MILLER
287	10353654101	SADDIQ	BEY
288	10345876101	SARAH JESSICA	FULLER
289	10114970001	SAVANNA J	FAULCONER
290	10553320801	SEAN	CLIFFORD
291	9000019201	SEAN	HJELLE
292	10226992001	SETH D	HENIGAN
293	10319845301	SHAQUEM	GRIFFIN
294	10319846501	SHAQUILL	GRIFFIN
295	9000020101	SHEA	LANGELIERS
296	10406869301	SHEA CHRISTOPHER	PATTERSON
297	10264964901	SLADE	CECCONI
298	10106258801	SOPHIE ELIZABETH	CUNNINGHAM
299	10399818401	SPENCER	MACKE
300	10345715001	SPENCER GEORGE	JONES
301	10441953201	STANLEY	DYE
302	10186006701	STEPHAN	BLAYLOCK
303	10339048001	STEPHEN DEON	CARR
304	10399844501	TAJZMEL	SHERMAN
305	10411041701	TANNER	MORGAN
	10264744601	TATHAN	MARTELL
	9000025501	TAYLER	PERSONS
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		I	
308	10272954201	TAYLOR	RAPP
309	10168612201	TEEGAN MAKAY	MADARA
310	60004591901	TEVIN	BROYLES
311	10174492401	TIMMY	HERNANDEZ
312	10060763901	TIMOTHY CHAD	HANSEN
313	10559025301	TRACE	MCSORLEY
314	10132179001	TRAJAN ATOA JAMES	PILI
315	10082362201	TRENTON	SIMPSON
316	10174410901	TREVON	BRADFORD
317	10393269001	TREVON	SIDNEY
318	9000024201	TREVOR	SCOTT
319	10569283901	TREY	LANCE
320	10322162101	TROY	CAUPAIN
321	10327318901	TROY CHARLES	FUMAGALLI
322	10126474401	TRU	THOMPSON
323	10088826401	TYJON	LINDSEY
324	60004098401	TYLER	BAUM
325	10115387901	TYLER	HERRO
326	10264878501	TYREE	ST LOUIS
327	10132151001	URIAH	LEIATAUA
328	10329114301	VALENTINO	DALTOSO
329	10278788801	VANCE	JACKSON
330	10407086901	VICTOR MORITZ	WAGNER
331	20001203001	VINCENT	SAMPSON
332	10399825101	VINCENT TREVON	MITCHELL
333	10071816401	WESTIN BRANNING	GRAVES
334	10115926201	WILL	LEVIS
335	10130617901	WILLIAM JACOB	FROMM
336	10038339701	XAVIER	SIMPSON
337	10559630901	YETUR	GROSS-MATOS
338	9000021401	ZACHARY	GELOF
339	10132297501	ZACHARY	KATOA
340	10132317701	ZACHARY	WILSON
341	10132084001	ZACHARY G	DAWE
342	10407053501	ZAKARIE	IRVIN
343	10234469301	ZION	BETHEA