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16	and Class Counsel [Additional counsel on signature page]					
17		S DISTRICT COU	ЭT			
18	NORTHERN DIST					
19		ND DIVISION				
20	In re RIPPLE LABS INC. LITIGATION,		18-cv-06753-PJH			
21			TION **AS MODIFIED			
22	This Document Relates To:	BY THE	COURT AND [PROPOSED] TO APPROVE FORM AND			
23	ALL ACTIONS	MANNEI	R OF CLASS NOTICE TO RD INC.'S CLIENTS			
24						
25						
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27						
28	STIPULATED [PROPOSED] ORDER TO APPROVE FORM AND MANNER OF CLASS NOTICE TO PAYWARD INC.'S CLIENTS					
	CASE NO. 1	18-cv-06753-PJH				

1	Lead Plaintiff Bradley Sostack, Defendants Ripple Labs Inc, XRP II, LLC, and Bradley			
2	Garlinghouse, and Non-Party and Intervenor Payward Inc., d/b/a Kraken Digital Asset Exchange			
3	("Kraken") (collectively, the "Parties") hereby stipulate as follows:			
4	WHEREAS, on January 11, 2024, the Court held a hearing on Plaintiff's Motion to			
5 6	Approve the Form and Manner of Class Notice, Dkt. 303, and Kraken's Motion to Intervene, Dkt.			
7	308, at which the Court granted Kraken's Motion to Intervene and stated that Kraken must "send			
8	the class notice in the standardized format sent to all class members" but may "send supplementary			
9	information to its clients that is tailored to their particular needs." Dkt. 335.			
10	WHEREAS, on January 18, 2024, the Court granted the Motion to Approve the Form and			
11	Manner of Class Notice in part, denying it in part only to the extent that it seeks to send notice to			
12	non-U.S. residents, and directed the parties to submit a stipulation to approve the final form of			
13 14	class notice Id			
15	WHEREAS, the Parties agree that class notice should be issued to class members who are			
16	Kraken clients on the same timeline it is issued to other class members.			
17	NOW, THEREFORE, IT IS HEREBY STIPULATED by and between Lead Plaintiff,			
18	Defendants, and Kraken, through their respective counsel, that:			
19	1. Notice sent by Kraken to its clients in the proposed class shall be by e-mail with the			
20	following form:			
21 22	Subject line: Notice of XRP class action lawsuit			
22	Dear Valued Client,			
24	We're reaching out to inform you of a class action lawsuit against Ripple Labs,			
25	which claims that they are liable to persons or entities who purchased XRP, amongst other claims.			
26	Our records indicate that you have purchased XRP on Kraken between July 3,			
27	2017 and June 30, 2023, which means that it may be within your rights to receive			
28	money or benefits that come from the lawsuit, depending on the outcome.			
	STIPULATED [PROPOSED] ORDER TO APPROVE FORM AND MANNER OF CLASS NOTICE TO PAYWARD INC.'S CLIENTS			
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Is my personal information being shared?

No, none of your information has been shared or will be shared by Kraken. Rather than providing your contact information to the Court, we chose to contact you directly because we hold our clients' privacy and security in the highest regard and stand strongly against unilaterally providing client data to any person or entity.

What do you need to do?

You can either choose to do nothing, or exclude yourself. For more information, please see the full court-authorized Notice here (SC URL).

The "here (SC URL)" above shall be replaced with a link to a Kraken-hosted support

article. That article will include a link to the full Court-approved long-form notice in

PDF format. The Parties recognize that Kraken may include such additional

commentary and responses to questions in the support article as it deems appropriate,

provided that Kraken clearly states that any additional commentary or responses are

15 not provided by the Court.

 The following notice deadlines will commence from the date the Court grants this Stipulated [Proposed] Order:

a. Within fourteen (14) days, JND Legal Administration LLC ("JND") will

commence sending the Email Notice, Dkt. 303-9, to all potential Class

Members for whom a valid email has been provided (the "Notice Date").

JND will mail a Postcard Notice, Dkt. 303-10, to any Class Member for whom

an Email Notice bounces back undeliverable and for whom a valid mailing

b. On or before the Notice Date, Kraken will commence sending Email Notice to its users who transacted in XRP during the relevant class period.

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STIPULATED [PROPOSED] ORDER TO APPROVE FORM AND MANNER OF CLASS NOTICE TO PAYWARD INC.'S CLIENTS CASE NO. 18-cv-06753-PJH

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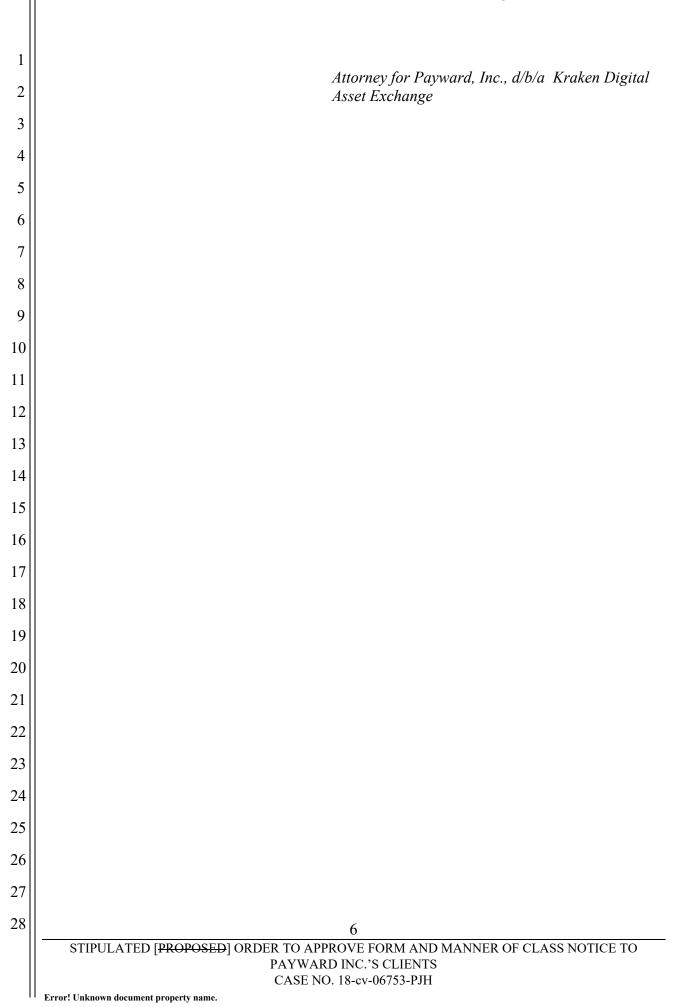
address has been provided.

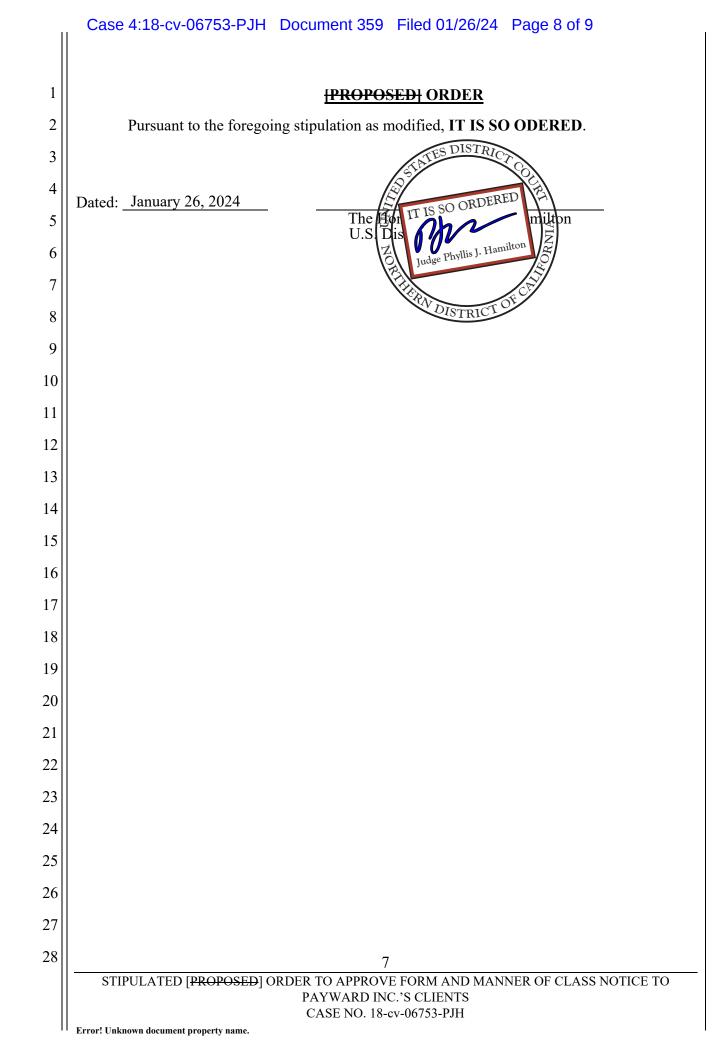
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1	c. On or before the Notice Date, JND will develop and deploy an informational
2	case-specific website where Class Members may obtain more information
3	about the litigation. The case website will provide links to important case
4	documents, including the Long Form Notice, Dkt. 303-12.
5	d. On or before the Notice Date, JND will commence a media notice campaign,
6	
7	lasting for three weeks, consisting of digital ads targeting a custom audience
8	using the Google Display Network, including on popular cryptocurrency
9	websites, as well as targeted ads on Reddit and X, as described in the
10	Intrepido-Bowden Declaration, Dkt. 303-7. The digital ads, Dkt. 303-11, will
11	include an embedded link to the case website.
12	e. On or before the Notice Date, JND will create and maintain an automated toll-
13 14	free telephone line that potential Class Members may contact for information
14	related to the litigation, and an email address for the same purpose. The
16	telephone line will have an interactive voice response available 24 hours a
17	day, seven days a week.
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20	office box for this matter where potential Class Members may send their
21	exclusion requests. JND will maintain an email address for the same purpose.
22	g. Class Members who wish to be excluded from the Class must send a letter or
23	email to JND requesting exclusion from In re Ripple Labs Inc. Litigation, with
24	their name, address, telephone number, email, and signature. Potential Class
25	Members will have fifty-six (56) days after the Notice Date to opt out.
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	STIPULATED [PROPOSED] ORDER TO APPROVE FORM AND MANNER OF CLASS NOTICE TO PAYWARD INC.'S CLIENTS CASE NO. 18-cv-06753-PJH

1	h I and Plaintiff shall file with the Court proof of dolivery of the Emoil Nation		
2	h. Lead Plaintiff shall file with the Court proof of delivery of the Email Notice,		
2	proof of commencement of the media campaign, and proof of website posting		
	of the Long Form Notice within 14 days of the Notice Date.		
4 5	<i>3.</i> **The case name on all class notice documents shall be standardized and made		
6	consistent with the caption used by the parties on their filings, namely, In re Ripple		
7	Labs Inc. Litigation.		
8			
9	Dated: January 26, 2024 By: <u>/s/ Michael Tayag</u>		
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24	Attorneys for Lead Plaintiff Bradley Sostack and Class Counsel		
25	Dated: January 26, 2024 By: <u>/s/ Bradley Oppenheimer</u>		
26	Damien J. Marshall (<i>pro hac vice</i>) dmarshall@kslaw.com		
27	Andrew Michaelson (<i>pro hac vice</i>) amichaelson@kslaw.com		
28	KING & SPALDING LLP 4		
	STIPULATED [PROPOSED] ORDER TO APPROVE FORM AND MANNER OF CLASS NOTICE TO PAYWARD INC.'S CLIENTS		
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1				
1	<u>ATTESTATION</u>			
2	Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that concurrence in the filing of this document has been obtained from the other signatories.			
3	DATED: January 26, 2024 /s/ Michael Tayag			
4	Michael Tayag			
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