

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

DAVID ORR, HENRY CHAMBERLAIN,
ANGELA MICKEL, and JENNIFER
GRADY, individually and on behalf of all
others similarly situated,

Plaintiffs,

V.

INTERCONTINENTAL HOTELS
GROUP, PLC, INTER-CONTINENTAL
HOTELS CORPORATION, and
INTERCONTINENTAL HOTELS
GROUP RESOURCES, INC.,

Defendants.

Case No.: 1:17-cv-01622-MLB

**PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT AGREEMENT**

Plaintiffs David Orr, Henry Chamberlain, Angela Mickel, and Jennifer Grady (“Representative Plaintiffs”), individually and on behalf of the Settlement Class, by and through Lead Class Counsel, respectfully move this Honorable Court for entry of an Order: (i) finding the Settlement Agreement, ECF 70-2 (the “Settlement”), to be fair, reasonable, and adequate, and granting final approval of the Settlement; and (ii) certifying the Settlement Class for settlement purposes only.¹

¹ The definitions in the Settlement are incorporated herein by reference.

Dated: August 21, 2020

Respectfully submitted,

David Orr, Henry Chamberlain, Angela Mickel, and Jennifer Grady, individually and on behalf of all others similarly situated,

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RULE 7.1(D) CERTIFICATE

The undersigned counsel certifies that this document has been prepared with Times New Roman 14-point font in accordance with Local Rule 5.1(C).

Dated: August 21, 2020

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing to be served on all counsel of record via the Court's ECF filing system.

Dated: August 21, 2020

/s/ David J. Worley
David J. Worley

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**PLAINTIFFS' MEMORANDUM OF LAW
IN SUPPORT OF MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT AGREEMENT**

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I. INTRODUCTION

Plaintiffs David Orr, Henry Chamberlain, Angela Mickel, and Jennifer Grady (“Representative Plaintiffs”)¹ respectfully submit this memorandum of law in support of their Motion for Final Approval of Class Action Settlement Agreement.

After hard-fought litigation and months of negotiations, the Settling Parties reached a class action settlement agreement (“Settlement”) with IHG. The Settlement provides that IHG shall pay up to \$1,550,000 in the aggregate to reimburse Settlement Class Members (i) up to \$250 per claimant for certain claimed and documented expenses (including lost time) the Data Security Incidents contributed to being incurred, and (ii) up to \$3,500 per claimant for unreimbursed losses due to fraudulent activity or unauthorized charges more likely than not caused by the Data Security Incidents. On May 18, 2020, after briefing and due consideration, the Court granted preliminary approval of the Settlement and directed that notice be provided to the Settlement Class in accordance with the Notice Program. *See* Order Granting Preliminary Approval of Class Action Settlement Agreement, Directing Notice to the Settlement Class, and Scheduling Final Fairness Hearing, ECF 72 (“Preliminary Approval Order”).

¹ The definitions in the Settlement are incorporated herein by reference.

The Court-approved Notice Program has been extremely effective. The Settlement Administrator, Heffler Claims Group LLC (“Heffler”) estimates that Notice reached 87% of Settlement Class Members an average of 3.5 times through a combination of direct and publication notice.

Settlement Class Members’ reaction to the Settlement has been overwhelmingly positive. Out of a Settlement Class estimated to include more than two million members, only one objection was filed and twenty-seven individuals requested to be excluded from the Settlement Class.

As shown herein, an analysis of the factors outlined by Rule 23(e) of the Federal Rules of Civil Procedure demonstrates the Settlement is fair, reasonable, and adequate. Respectfully, the Court should grant final approval of the Settlement.

II. FACTUAL BACKGROUND

On May 5, 2017, Plaintiff David Orr instituted a civil action on behalf of a class of similarly situated persons against Inter-Continental Hotels Corporation and InterContinental Hotels Group Resources, Inc. alleging that as a result of Defendants’ security failures, he and the other proposed class members had their payment card information stolen by cybercriminals and incurred damages. On July 10, 2017, Inter-Continental Hotels Corporation and InterContinental Hotels Group Resources, Inc., filed a motion to dismiss Orr’s complaint for failure to state a claim.

On July 14, 2017, Plaintiffs David Orr and Henry Chamberlain filed their amended complaint. On August 4, 2017, Plaintiffs David Orr, Henry Chamberlain, Angela Mickel, and Jennifer Grady filed their Second Amended Complaint.

On September 8, 2017, Inter-Continental Hotels Corporation and InterContinental Hotels Group Resources, Inc., moved to dismiss the Second Amended Complaint for failure to state a claim. The motion was fully briefed and pending when the Settling Parties commenced settlement efforts ultimately culminating in the Settlement.

III. SUMMARY OF THE SETTLEMENT

A. The Settlement Class

In granting preliminary approval of the Settlement, the Court concluded that the following Settlement Class was likely to be certified for settlement purposes only at the Final Fairness Hearing:

All persons who reside in the United States and used their credit or debit card at the front desk of an IHG-Branded Hotel location, or used their credit or debit card at a restaurant or bar on an IHG-managed hotel or property, as set forth at the locations and in the time periods identified in Exhibit I to [the Settlement].

Preliminary Approval Order ¶ 3; *see also* SA ¶¶ 1.20, 2.7. The following Persons are specifically excluded from the Settlement Class: (a) individuals who are or were during the Data Security Incidents officers or directors of IHG; (b) any justice, judge,

magistrate judge, or law clerk of this Court, the United States Court of Appeals for the Eleventh Circuit, and the Supreme Court of the United States. Preliminary Approval Order ¶ 3; *see also* SA ¶ 1.20.

B. Settlement Benefits

The Settlement provides the following benefits:

1. Reimbursement of Certain Expenses and Losses Due to Fraudulent or Unauthorized Charges

The Settlement provides that IHG shall pay up to \$1,550,000 in the aggregate to reimburse Settlement Class Members for certain expenses and fraudulent or unreimbursed charges connected to the Data Security Incidents. SA ¶¶ 1.2, 2.1-2.3. In the event the value of approved claims in the aggregate exceeds \$1,550,000, each individual approved claim shall be reduced in a pro rata amount so that the aggregate claims reimbursement is exactly \$1,550,000. SA ¶ 2.3. Settlement Class Members may submit claims to receive reimbursement of both out-of-pocket expenses and losses incurred due to fraudulent and unauthorized charges. SA ¶ 2.2(c).

Expense Reimbursement Claims. Settlement Class Members providing the requisite documentation shall be entitled to claim and receive up to \$250 as reimbursement for the following categories of expenses the Data Security Incidents contributed to being incurred: (i) charges related to unavailability of funds and unreimbursed card replacement, card reissuance, overdraft, over-the-limit, and late

fees; (ii) long-distance telephone charges, cellular phone minutes (if charged by the minute), Internet usage charges (if charged by the minute or amount of data usage), and text messages (if charged by the message) as a result of the Data Security Incidents; (iii) postage and shipping charges; (iv) interest on payday loans due to card cancellation or over-the-limit situations; (v) amounts paid for credit reports or for obtaining and removing credit freezes and financial account freezes; (vi) up to \$75 in credit monitoring costs purchased and paid for at any time between August 1, 2016, through and including the Claims Deadline and any extensions thereof; (vii) reimbursement for lost time up to 4 hours at \$20.00/hour for time spent dealing with replacement card issues, updating automatic payments associations, contesting fraudulent charges, and otherwise dealing with the Data Security Incidents. SA ¶ 2.1.

Fraudulent and Unauthorized Charge Claims. Settlement Class Members providing the requisite documentation shall be entitled to claim and receive up to \$3,500 as reimbursement of actual unreimbursed losses due to fraudulent activity or unauthorized charges more likely than not caused by the Data Security Incidents. SA ¶ 2.2. If the amount claimed exceeds \$200, the Settlement Administrator may in its discretion require the claimant to include information regarding the number of other data security incidents the claimant was subjected to for the same credit or debit card

used in the Data Security Incidents and any recoveries or payments received from those breaches. SA ¶ 2.2.

The claims deadline is September 12, 2020. To receive the benefits of the Settlement, Settlement Class Members need only log onto the Settlement website, complete the Claim Form, and submit the Claim Form and requisite documentation via the Settlement website or by mailing the materials to the Settlement Administrator.

2. Costs of Notice and Settlement Administration

The costs of providing Notice of the Settlement to the Settlement Class and the costs of Settlement administration shall be paid by IHG. SA ¶ 2.6

3. Attorneys' Fees, Costs, and Expenses, and Representative Plaintiff Service Awards

Pursuant to the Settlement and subject to Court approval, IHG agreed not to oppose Representative Plaintiffs' request for payment of attorneys' fees, costs, and expenses in the amount of \$550,000 and Representative Plaintiff service awards in the amount of \$1,500 for each Representative Plaintiff. SA ¶¶ 7.2, 7.3. All awards of attorneys' fees, costs, and expenses, and Representative Plaintiff service awards shall be paid by IHG per the terms of the Settlement. SA ¶ 7.1. The Settling Parties did not discuss attorneys' fees, costs, and expenses, or Representative Plaintiff service awards until after all the substantive elements of the Settlement were agreed

to, aside from the fact that they would be the responsibility of IHG. SA ¶ 7.1. The amounts of any award of attorneys' fees, costs, and expenses and Representative Plaintiff service awards are intended to be considered by the Court separately from the Court's consideration of the fairness, reasonableness, and adequacy of the Settlement. SA ¶ 7.6.

On July 22, 2020, Representative Plaintiffs filed their Motion for Award of Attorneys' Fees, Reimbursement of Costs and Expenses, and Representative Plaintiff Service Awards ("Fee Motion"). ECF 75. Representative Plaintiffs' Fee Motion was uploaded to the Settlement website the same day.

C. The Court-Approved Notice Plan Was Substantial and Effective

Where a class has been certified under Fed. R. Civ. P. 23(b)(3), "the [C]ourt must direct to class members the best notice that is practicable under the circumstances." Fed. R. Civ. P. 23(c)(2)(B). Notice serves to "afford members of the class due process which, in the context of the Rule 23(b)(3) class action, guarantees them the opportunity to be excluded from the class action and not be bound by any subsequent judgment." *Peters v. Nat'l R.R. Passenger Corp.*, 966 F.2d 1483, 1486 (D.C. Cir. 1992) (citing *Eisen v. Carlisle & Jacquelin*, 417 U.S. 156, 173–74 (1974)). "[D]ue process requires reasonable effort to inform affected class members

through individual notice, not receipt of individual notice.” *Rannis v. Recchia*, 380 F. App’x 646, 650 (9th Cir. 2010).

Here, the Court-approved Notice Program was extremely effective. The Notice Program was implemented by Heffler, an experienced class action notice provider. As explained in detail in the Declaration of Jeanne C. Finegan (“Finegan Decl.”), attached hereto as Exhibit A, Notice was provided in accordance with the Court-approved Notice Program. Pursuant to the Notice Program, direct notice was sent via email or postcard, notice was published in *People Magazine* and on pre-vetted websites and popular social media platforms, a press release was issued, a Settlement website was established, and a toll-free number was set up. The Notice Program reached an estimated 87% of Settlement Class Members on average 3.5 times. Such notice readily satisfied the “best practicable” standard. *See* Federal Judicial Center, *Judges’ Class Action Notice and Claims Process Checklist and Plain Language Guide* at 3 (2010) (recognizing 70% reach to be reasonable).

Heffler caused 1,198,875 Email Notices to be sent to Settlement Class Members between June 17, 2020, and June 20, 2020. Finegan Decl. ¶ 13. Additionally, on June 24, 2020, Heffler mailed 620,397 Postcard Notices to Settlement Class Members IHG was only able to provide a physical address and Settlement Class Members whose Email Notice was returned as undeliverable and

IHG had a physical address. Finegan Decl. ¶ 14. For 35,685 Postcard Notices returned as undeliverable by the USPS, Heffler ran address searches and re-mailed Postcard Notice to 25,692 individuals for whom an alternative address was found. Finegan Decl. ¶ 14.

Publication Notice appeared in *People Magazine* on June 26, 2020, as a half-page, black and white ad. Heffler Decl. ¶¶ 16–17. As part of a targeted multi-channel campaign, publication notice also appeared on pre-vetted websites, exchanges, and social media platforms Facebook, Instagram, and Twitter, generating more than 54 million online display and social media impressions. Finegan Decl. ¶¶ 18–24. Keyword search targeting was used to show Publication Notice to users in their Google search results. Finegan Decl. ¶ 19. And on June 15, 2020, a press release was issued over PR Newswire’s US1 Newswire, generating approximately 154 news mentions of the Settlement. Finegan Decl. ¶¶ 25–26.

An informational website was established with an easy-to-remember domain name, www.ihgdatasecuritysettlement.com, that was prominently displayed in the Postcard Notice, Email Notice, Claim Form, and Long Form Notice. Finegan Decl. ¶ 27. The informational website includes a short summary of the Settlement, answers to frequently asked questions, and important dates relating to the Settlement (exclusion deadline, objection deadline, claim filing deadline, and final approval

hearing date). Finegan Decl. ¶ 27. Through the informational website, Settlement Class Members are able to submit a Claim Form electronically, view and download the Claim Form, Settlement Agreement, Long Form Notice, Preliminary Approval Order, and Plaintiffs’ Motion for Award of Attorneys’ Fees, Reimbursement of Costs and Expenses, and Representative Plaintiff Service Awards. As of August 14, 2020, there had been 109,300 visits to the Settlement website. Finegan Decl. ¶ 27.

A toll-free Interactive Voice Response (“IVR”) telephone line was also established for Settlement Class Members to call to obtain information regarding the Settlement and to request that a copy of the Long Form Notice or Claim Form be mailed to them. Finegan Decl. ¶ 28.

The Notice Program, as designed and implemented, constitutes the best notice practicable under the circumstances, complies with Fed. R. Civ. P. 23, and satisfies due process requirements.

IV. ARGUMENT

“Because class settlements minimize the litigation expenses of the parties and reduce the strain that litigation imposes upon already scarce judicial resources,” *Lunsford v. Woodforest Nat’l Bank*, No. 1:12-cv-103-CAP, 2014 WL 12740375, at *4 (N.D. Ga. May 19, 2014), “federal courts have long recognized a strong policy

and presumption in favor of class settlements.” *George v. Academy Mortg. Corp. (UT)*, 369 F. Supp 3d 1356, 1367 (N.D. Ga. 2019).

A class action settlement may only be approved after a hearing and a finding that the settlement is fair, reasonable, and adequate. Fed. R. Civ. P. 23(e)(1)(C). Rule 23(e) of the Federal Rules of Civil Procedure requires that a court consider the following factors in determining whether a settlement satisfies the required standard of fair, reasonable, and adequate:

(A) the class representatives and class counsel have adequately represented the class; (B) the proposal was negotiated at arm’s length; (C) the relief provided for the class is adequate, taking into account: (i) the costs, risks, and delay of trial and appeal; (ii) the effectiveness of any proposed method of distributing relief to the class, including the method of processing class-member claims; (iii) the terms of any proposed award of attorney's fees, including timing of payment; and (iv) any agreement required to be identified under Rule 23(e)(3); and (D) the proposal treats class members equitably relative to each other.

Fed. R. Civ. P. 23(e)(2).

The Eleventh Circuit Court of Appeals has identified six factors to be considered in analyzing the fairness, reasonableness, and adequacy of a class settlement under Rule 23(e): (i) the existence of fraud or collusion behind the settlement; (ii) the complexity, expense, and likely duration of the litigation; (iii) the stage of the proceedings and the amount of discovery completed; (iv) the probability of the plaintiffs’ success on the merits; (v) the range of possible recovery; and (vi)

the opinions of the class counsel, class representatives, and the substance and amount of opposition to the settlement. *Bennett v. Behring Corp.*, 737 F.2d 982, 986 (11th Cir. 1984).²

Analysis of the above factors demonstrates the Settlement is fair, reasonable, and adequate, and should be approved.

A. Final Approval of the Settlement Is Appropriate

1. The Settlement Class Is Well Represented

Lead Class Counsel and Plaintiffs' Executive Committee have significant experience in data breach consumer class actions and are well-informed of the legal claims at issue and the risks of this case. *See* Lead Counsel Resumes (ECF 70-3), Executive Committee Resumes (ECF 70-4).

Since the inception of this litigation, Lead Class Counsel and Executive Committee members have worked diligently to advance Representative Plaintiffs' and other Settlement Class Members' interests. After learning of the Data Security Incidents, they conducted a thorough preliminary investigation into the law and facts

² The advisory committee notes to the 2018 amendments of Rule 23 indicate that the 23(e)(2) factors are not meant "to displace any factor, but rather to focus the court and the lawyers on the core concerns of procedure and substance that should guide the decision whether to approve the proposal." The amended rule largely overlaps with the *Bennett* factors, but the *Bennett* factors will be addressed in the course of discussing the 23(e)(2) factors where most appropriate.

of the case, filed the lawsuit, and subsequently filed two amended class action complaints. They also opposed IHG's motion to dismiss the Second Amended Complaint and drafted and responded to notices of supplemental authority to keep the Court apprised of relevant decisions.

Prior to reaching the Settlement, Lead Class Counsel and counsel for IHG engaged in months of settlement negotiations. Throughout those negotiations, Lead Class Counsel pursued informal discovery from IHG that was appropriately targeted at information relevant to the Settlement. *See In re Mego Fin. Corp. Sec. Litig.*, 213 F.3d 454, 459 (9th Cir. 2000) ("In the context of class action settlements, formal discovery is not a necessary ticket to the bargaining table where the parties have sufficient information to make an informed decision about settlement.") (citations and quotations omitted); *see also* Manual for Complex Litigation (Fourth) § 13.12 (2004) (recognizing that the benefits of settlement are diminished if it is postponed until discovery is completed and approving of targeting early discovery at information needed for settlement negotiations). Informal discovery is a recognized method of minimizing the cost, delay, and burden associated with formal discovery. *See* Manual for Complex Litigation (Fourth) § 11.423 (2004). Indeed, to further such ends, courts are to "encourage counsel to exchange information, particularly relevant documents, without resort to formal discovery." *Id.*

Pursuant to the confirmatory discovery process provided for by the Settlement, Lead Class Counsel requested, and received from IHG, all PFI reports relating to the Data Security Incidents, IHG's service provider Report on Compliance, and an Attestation on Compliance for eleven IHG-managed properties. SA ¶ 10.4. Lead Class Counsels' review of the PFI report, attestations, and other documents provided by IHG further confirmed their belief that that the Settlement is fair, reasonable, and adequate, and represents an excellent result for Settlement Class Members.

Representative Plaintiffs have likewise worked diligently on behalf of the Settlement Class. They stepped forward to prosecute this action on behalf of all Settlement Class Members, were involved in the drafting of the complaint and responding to discovery, and reviewed and approved the Settlement. This factor favors final approval.

2. The Settlement Was Reached as a Result of Hard-Fought, Arm's Length Negotiations

The Settlement is the product of hard-fought litigation and arm's length negotiations after a careful assessment of the strengths of Representative Plaintiffs' claims and the arguments of IHG. The Settlement was executed after months of negotiation by experienced counsel. The significant benefits conferred upon the

Settlement Class by the Settlement attest to the fact that the negotiations were arm's-length and hard fought.

3. The Settlement Benefits Are Excellent, Taking into Consideration the Costs, Risks, and Delay of Trial and Potential Appeals

Balancing the risks of continued litigation, the benefits of the Settlement, and the immediacy and certainty of the significant recovery provided for by the Settlement, supports approval of the Settlement.

Representative Plaintiffs and Lead Class Counsel believe the claims asserted in the litigation have merit. They would not have fought so hard to advance the claims if it were otherwise. But they also recognize the substantial risks involved in continuing this litigation. IHG has maintained its positions that Representative Plaintiffs cannot state claims for relief, that a litigated class or classes should not be certified, that it would not be found liable at trial, and that Representative Plaintiffs cannot prove damages resulting from the Data Security Incidents. While they disagree with IHG's views, Lead Class Counsel are mindful of the inherent problems of proof and possible defenses to the claims asserted in the litigation. They also recognize the difficulties in establishing liability on a class-wide basis through summary judgment or even at trial and in achieving a result better than that offered by the Settlement here.

Prosecuting this litigation through trial and appeal would likely be lengthy, complex, and impose significant costs on all parties. *See, e.g., In re Austrian & German Bank Holocaust Litig.*, 80 F. Supp. 2d 164, 174 (S.D.N.Y. 2000) (recognizing that “[m]ost class actions are inherently complex and settlement avoids the costs, delays, and multitude of other problems associated with them”). Continued proceedings necessary to litigate this matter to final judgment would likely include substantial motion practice, extensive fact discovery, class certification proceedings, further dispositive motions and a trial and appeal. Given the complex nature of the security breaches at issue continued proceedings would likely include substantial expert discovery and significant motion practice related to such. Also, considering the size of the Settlement Class and the amount of money at stake, any decision on the merits would likely be appealed, causing further delay.

The Settlement, in contrast, provides certainty of recovery by making available up to \$1,550,000 for the payment of valid claims for documented expenses, lost time (up to 4 hours at \$20.00/hour), and losses due to fraudulent activity or unauthorized charges. To receive the benefits of the Settlement, Settlement Class Members need only log on to the Settlement website and complete and submit a Claim Form and requisite documentation (via the Settlement website or mailing the materials to the Settlement Administrator).

This factor favors approval of the Settlement. *See Grant v. Capital Mgmt. Servs., L.P.*, No. 10-CV-WQH BGS, 2014 WL 888665, at *3 (S.D. Cal. Mar. 5, 2014) (“The court shall consider the vagaries of the litigation and compare the significance of immediate recovery by way of compromise to the mere possibility of relief in the future, after protracted and expensive litigation. In this respect, it has been held proper to take the bird in hand instead of a prospective flock in the bush”) (citations and quotations omitted).

4. The Method of Distributing Relief Supports Final Approval of the Settlement

Rule 23(e)(2)(C)(ii) requires consideration of “the effectiveness of any proposed method of distributing relief to the class, including the method of processing class-member claims.”

The Notice Program and Claim Form were designed to encourage the filing of valid claims by Settlement Class Members. To claim reimbursement, Settlement Class Members need only provide their contact information, describe time spent related to the Data Security Incidents or submit documentation supporting unreimbursed expenses or losses due to fraudulent or unauthorized activity, and submit their Claim Form (online or through mailing). All claims are being processed by Heffler, an experienced and nationally-recognized class action administration

firm. To facilitate timely and efficient payment, Settlement Class Members are also given the option to receive payment electronically or have a check mailed to them.

The methods of distributing relief to Settlement Class Members further support that the Settlement is fair, reasonable, and adequate.

5. The Terms of the Proposed Award of Attorneys' Fees Support Approval of the Settlement

Rule 23(e)(2)(C)(ii) requires consideration of “the terms of any proposed award of attorney’s fees, including timing of payment.”

The terms of the proposed attorneys’ fee award are consistent with class action best practices. The Settling Parties did not discuss attorneys’ fees until after all substantive elements of the Settlement were agreed upon. SA ¶ 7.1. The amount of any attorneys’ fee award is intended to be considered by the Court separately from the Court’s consideration of the fairness, reasonableness, and adequacy of the Settlement. SA ¶ 7.6. Additionally, the attorneys’ fees award shall be paid within fourteen (14) days of the Effective Date of the Settlement—there is no quick-pay provision in the Settlement. SA ¶ 7.5.

Representative Plaintiffs’ Fee Motion requests an attorneys’ fee award of \$545,483.30, reimbursement of costs and expenses in the amount of \$4,516.70, and payment of a service award to each Representative Plaintiff in the amount of \$1,500. The requested attorneys’ fee award amounts to 21 percent of the value of benefits

counsel achieved on behalf of the Settlement Class, which is well within the range of reasonable in complex data breach class action cases, such as this matter. *See, e.g., In re Arby's Restaurant Grp., Inc. Data Sec. Litig.*, No. 17-cv-1035, 2019 WL 2720818, at *4 (N.D. Ga. June 6, 2019) (finding award of 29.6% of the recovery to be reasonable).

In accordance with Fed. R. Civ. P. 23(h), Representative Plaintiffs' Fee Motion was filed on July 22, 2020, and posted on the Settlement website the same day. The deadline to object to the Settlement was August 12, 2020. Not a single objection to Representative Plaintiffs' Fee Motion was submitted. The terms of the proposed attorneys' fee award support final approval of the Settlement.

6. The Settlement Parties' Agreements

The agreement of the Settling Parties is reflected in the Settlement, which was executed by the Settling Parties on April 14, 2020.

7. The Settlement Treats Settlement Class Members Equitably Relative to One Another

The Settlement provides all Settlement Class Members an opportunity to submit a claim for reimbursement of reasonable out-of-pocket expenses and actual fraudulent or unauthorized charges. This factor supports approval of the Settlement.

8. Settlement Class Members' Reaction to the Settlement

Settlement Class Members' reaction to the Settlement has been overwhelmingly positive and further supports approval. After the substantial Notice Program detailed above, only a single *pro se* objection was submitted. The miniscule number of objections, combined with only 27 requests for exclusion, confirm that the Settlement was well received and should be approved. *In re Equifax Inc. Customer Data Sec. Breach Litig.*, No. 1:17-MD-2800, 2020 WL 256132, at *10 (N.D. Ga. Mar. 17, 2020) (recognizing that a “miniscule number of objectors in comparison to the class size is entitled to significant weight in the final approval analysis”).

The single objector, Jeff Stollman, asserts he spent time as a result of his credit cards being cancelled and reissued in the wake of the Security Incidents. As explained above, the Settlement entitles Settlement Class Members to reimbursement for up to four hours at \$20.00/hour for time spent dealing with replacement card issues. SA ¶ 2.1. To receive a payment under the Settlement, Mr. Stollman would need to go to the Settlement website, complete an online claim form (including the number of hours claimed and a brief description of what he did), and submit the claim form prior to the September 12, 2020 claims deadline.

In the objection, Mr. Stollman argues that the Settlement does not do enough to provide coverage for future liability resulting from the Data Breach. The Settlement resulted from lengthy and rigorous negotiations, with both sides compromising in the interest of resolution. The alternative to the immediate relief made available under the Settlement is continued discovery, class certification and summary judgment proceedings, and trial. Plaintiffs' failure to prevail at any one of these steps would result in Settlement Class Members receiving nothing, a fact Mr. Stollman may not understand. The objection fails to recognize that "settlement, as a product of compromise, typically offers less than a full recovery." *Browning v. Yahoo Inc.*, No. C04-01463, 2007 WL 4105971, *5 (N.D. Cal. Nov. 16, 2007) (citing *EEOC v. Hiram Walker & Sons, Inc.*, 768 F.2d 884, 889 (7th Cir. 1985)); *Linney v. Cellular Alaska P'ship*, 151 F.3d 1234, 1242 (9th Cir. 1998) ("[T]he very essence of a settlement is compromise, a yielding of absolutes and an abandoning of highest hopes.").

The objection is "tantamount to complaining that the settlement should be better, which is not a valid objection." *Browning*, 2007 WL 4105971, *5 (citing *Hanlon v. Chrysler Corp.*, 150 F.3d 1011, 1027 (9th Cir. 1998)); *see also In re Equifax Inc. Customer Data Sec. Breach Litig.*, 2020 WL 256132, at *15 ("Objections that the settlement fund is too small for the class size, or that [the

defendant] should be required to pay more, do not take into account the risks and realities of litigation, and are not a basis for rejecting the settlement.”). Accordingly, the objection should be overruled.

B. The Settlement Class Should Be Certified for Settlement Purposes

In the Preliminary Approval Order, the Court found that the Settlement Class was likely to be certified for settlement purposes only at the Final Fairness Hearing. Nothing relevant to the Court’s class certification analysis has changed since entry of that Order. As shown below, the requirements of Rule 23(a) and 23(b)(3) are satisfied, and the Settlement Class should be certified for settlement purposes only.

1. The Requirements of Fed. R. Civ. P. 23(a) Are Satisfied

Numerosity: Fed. R. Civ. P. 23(a)(1) requires a showing that “the class is so numerous that individual joinder of all members is impracticable.” Fed. R. Civ. P. 23(a)(1). Here, it is estimated that the Data Security Incidents impacted more than two million Settlement Class Members. The numerosity requirement is readily satisfied.

Commonality: Rule 23(a)(2) requires the existence of a question of law or fact that is common to all Settlement Class Members and capable of class-wide resolution, the determination of which is central to the validity of all class members’ claims. *Wal-Mart Stores, Inc. v. Dukes*, 131 S. Ct. 2541, 2551 (2011).

Several questions of law and fact common to all Settlement Class Members exist, including: (i) whether IHG violated common law duties and breached an implied contract with its customers; (ii) whether IHG failed to properly secure and protect Settlement Class Members' payment card information, and (iii) whether Settlement Class Members are entitled to damages, injunctive relief, or other equitable relief, and the measure of such damages and relief. These legal and factual questions are common to each member of the Settlement Class.

Typicality: Typicality is satisfied when "the claims or defenses of the representative parties are typical of the claims or defenses of the class." Fed. R. Civ. P. 23(a)(3). Representative Plaintiffs and all other Settlement Class Members' claims arise from IHG's alleged failure to implement and maintain reasonable security measures and the resulting Data Security Incidents, and their claims are based on the same legal theories. The typicality requirement is satisfied.

Adequacy: Representative parties must "fairly and adequately protect the interests of the class." Fed. R. Civ. P. 23(a)(4). Representative Plaintiffs have demonstrated that they are well-suited to represent the Settlement Class. They each came forward and agreed to seek to represent the Settlement Class and have been involved in this matter since that time, including reviewing and approving court filings as appropriate, corresponding with Plaintiffs' counsel as appropriate during

the course of the Litigation, and reviewing and evaluating the Settlement Agreement. Lead Class Counsel and Executive Committee members are well-qualified to represent the Settlement Class, as they each possess significant experience leading the prosecution of complex class action matters. *See* Lead Counsel Resumes (ECF 70-3), Executive Committee Resumes (ECF 70-4).

2. The Requirements of Fed. R. Civ. P. 23(b)(3) Are Satisfied

Rule 23(b)(3) requires that “questions of law or fact common to the members of the class predominate over any questions affecting only individual members of the class, and that a class action is superior to other available methods for the fair and efficient adjudication of the controversy.” Fed. R. Civ. P. 23(b)(3).

Predominance: So long as “one or more of the central issues in the action are common to the class and can be said to predominate,” certification is proper under Rule 23(b)(3) “even though other important matters will have to be tried separately, such as damages or some affirmative defenses peculiar to some individual class members.” *In re Delta/AirTran Baggage Fee Antitrust Litig.*, 317 F.R.D. 675, 682 (N.D. Ga. 2016). The above-identified questions common to all Settlement Class Members predominate over any potential individual questions.

Superiority: Rule 23(b)(3) requires a class action to be “superior to other available methods for the fair and efficient adjudication of the controversy.”

A class action is superior to other available methods for fairly and efficiently adjudicating Settlement Class Members' claims against IHG. *See Phillips Co. v. Shutts*, 472 U.S. 797, 809 (1985) (“[c]lass actions . . . permit the plaintiffs to pool claims which would be uneconomical to litigate individually . . . [in such a case,] most of the plaintiffs would have no realistic day in court if a class action were not available”). Reason forecloses a person’s willingness to shoulder the great expense of litigating the claims on their own against IHG given the comparatively small size of each individual Settlement Class Member’s claim. The superiority requirement is satisfied.

V. CONCLUSION

As the foregoing demonstrates, the Settlement is fair, reasonable, and adequate, and the single objection to the Settlement is without merit and should be overruled. Representative Plaintiffs, individually and on behalf of the Settlement Class, by and through Lead Class Counsel, pray that this Honorable Court enter an Order: (1) finding that the Settlement is fair, reasonable, and adequate, and granting it final approval; and (2) certifying the Settlement Class for settlement purposes only.

Dated: August 21, 2020

Respectfully submitted,

David Orr, Henry Chamberlain, Angela Mickel, and Jennifer Grady, individually and on behalf of all others similarly situated,

/s/ David J. Worley

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RULE 7.1(D) CERTIFICATE

The undersigned counsel certifies that this document has been prepared with Times New Roman 14-point font in accordance with Local Rule 5.1(C).

Dated: August 21, 2020

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing to be served on all counsel of record via the Court's ECF filing system.

Dated: August 21, 2020

/s/ David J. Worley
David J. Worley

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DAVID ORR, HENRY CHAMBERLAIN,
ANGELA MICKEL, and JENNIFER
GRADY, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

INTERCONTINENTAL HOTELS
GROUP, PLC, INTER-CONTINENTAL
HOTELS CORPORATION, and
INTERCONTINENTAL HOTELS
GROUP RESOURCES, INC.,

Defendants.

Case No.: 1:17-cv-01622-MLB

**DECLARATION OF JEANNE C.
FINEGAN, APR CONCERNING
CLASS MEMBER
NOTIFICATION AND CLAIMS
ADMINISTRATION**

Hon. Michael L. Brown

I, JEANNE C. FINEGAN, declare as follows:

INTRODUCTION

1. I am President and Chief Media Officer of HF Media, LLC, Inc. (“HF”) a division of Heffler Claims Group LLC (“Heffler”). This Declaration is based upon my personal knowledge as well as information provided to me by my associates and staff, including information reasonably relied upon in the fields of advertising media and communications.

2. Pursuant to the Settlement Agreement, dated April 14, 2020, Heffler was engaged by the parties to this litigation to develop and implement a legal notice and claims administration program as part of the parties’ proposed class action settlement.

3. The purpose of this Declaration is to provide a final status update concerning the successful implementation of the notice program for this settlement, which commenced on June 15, 2020 and was substantially completed by July 14, 2020. The notice program employed best-in-class tools and technology and reached an estimated 87% of Settlement Class Members nationwide, on average 3.5 times, through direct notice, publication media notice through print, online display and social impressions with cross-device targeting on desktop and mobile, a press release, a settlement website and a toll-free number.

QUALIFICATIONS

4. A comprehensive description of my credentials and experience that qualify me to provide expert opinions on the adequacy of the class action notice program was previously filed with this Court on April 14, 2020. In summary, I have served as an expert directly responsible for the design and implementation of over 1,000 legal notice programs, some of which are the largest and most complex programs ever implemented in both the United States and Canada.

NOTICE PROGRAM SUMMARY

5. The notice program for this settlement was designed to inform Class Members of the class action settlement between Plaintiffs and Defendants InterContinental Hotels Corporation and InterContinental Hotels Group Resources, Inc. (collectively, “IHG”). Pursuant to the Settlement Agreement, §1, ¶ 1.29, the Settlement Class is defined as:

“All persons who reside in the United States and used their credit or debit card at the front desk of an IHG-branded hotel location, or used their credit or debit card at a restaurant or bar on an IHG-managed property, as set forth at the locations and in the time periods identified in Exhibit I to this Agreement.”

The notice program included the following components:

- Direct notice to known Class Members;
- Print publication once in a generally circulated magazine targeted to reach Class Members;

- Online display banner advertising specifically targeted to reach Class Members;
- Keyword Search targeting Class Members;
- Social media through Facebook, Instagram and Twitter;
- A press release across PR Newswire's US1 Newslines;
- An informational website on which the notices and other important Court documents are posted; and
- A toll-free information line by which Class Members can call 24/7 for more information about the Settlement, including, but not limited to, requesting copies of the Long Form Notice or Claim Form.

CAFA NOTICE

6. On behalf of defendant IHG, Heffler provided notice of the proposed Settlement reflected in the Settlement Agreement pursuant to the Class Action Fairness Act 28 U.S.C. §1715(b) ("the CAFA Notice"). At IHG's direction and in accord with the Settlement Agreement, Heffler sent the CAFA Notice, attached hereto as **Exhibit A**, and an accompanying CD containing the documents required under 28 U.S.C. §1715(b)(1)-(8), to the Attorney General of the United States and to the 56 states', territories', and the District of Columbia Attorneys General identified in the CAFA Notice via First-Class Certified Mail, on April 23, 2020.

DIRECT NOTICE SET UP

7. Heffler opened and continues to use the post office box address of: IHG Data Security Settlement; c/o Settlement Administrator; P.O. Box 8247; Philadelphia, PA 19101-8247 (“the Settlement P.O. Box”) to receive Requests for Exclusion, undeliverable Class Notices, paper Claim Forms, inquiries, and other communications about the Settlement.

8. Heffler set up and continues to monitor the toll-free telephone number 1-833-913-4210 and the website *www.IHGDataSecuritySettlement.com* (“the Settlement Website”), as listed in the Class Notice and the Published Notice, for Class Members to contact us with questions, review court documents, and/or submit a claim.

9. Counsel for the parties provided Heffler with approved text for both the short-form and long form Notices. Heffler then prepared the long-form Notice (for posting to the Settlement Website) and the short-form Notice to be emailed (“the Email Notice”) and the to be mailed (“the Postcard Notice”) via U.S. First Class Mail.

10. These Notices provided Settlement Class Members with adequate information of the proposed Settlement and Settlement Class Members’ rights to object to or be excluded from the Settlement Class. The Notices advised Settlement

Class Members of the Settlement, and that they could submit a written Request for Exclusion postmarked by August 12, 2020, an Objection filed with the Court by, and mailed to counsel for the parties, postmarked by August 12, 2020, or obtain or submit a Claim Form by visiting the Settlement Website or by calling 1-833-913-4210, and that completed Claim Forms must be submitted or postmarked by September 12, 2020. Exemplars of these Notices and the Claim Form are attached hereto as **Exhibit B.**

DIRECT NOTICE TO CLASS

11. I have been informed by the parties that there are approximately 2,250,000 potential class members. As described and detailed below, the direct outreach through email and physical mail provided actual notice to 1,100,298 individual class members, or nearly 49% of the class. This net statistic excludes duplication that occurs from individuals who maintain multiple email accounts and who could have received multiple notices

12. Direct Notice was accomplished as follows: Heffler received two lists of potential Class Members (“the Class List”) from IHG Defense Counsel which included the names, mailing addresses (if available) and email addresses (if available) of proposed Settlement Class Members. We were able to cross-reference and identify: (i) a total of 614,426 records containing an email address (with a total

of 1,198,875 email addresses); and (ii) a total of 495,706 proposed Settlement Class Members with addresses only (no email address), which were processed, standardized and updated utilizing the National Change of Address Database (“NCOA”) maintained by the U.S. Postal Service (“USPS”). The NCOA contains change of address notifications filed with the USPS. In the event an individual had filed a USPS change of address notification, the address listed with NCOA was used in connection with the mailing of the short-form Notice (“NCOA Processing”).

EMAIL PROGRAM

13. The email program commenced on June 17, 2020 and continued through June 20, 2020. A total of 1,198,875 Email Notices were emailed to all persons on the Class List for whom a facially valid email address was available. Heffler tracked and monitored any emails that bounced back and attempted to resend any such emails. However, a total of 124,691 emails were undeliverable.

MAILING PROGRAM

14. The mailing program commenced on June 24, 2020. A total of 620,397 Postcard Notices were printed, processed through the NCOA and mailed via postage prepaid, First Class U.S. Mail to: (a) the 495,706 potential Settlement Class Members included on Class List for whom only a physical mailing address was available; and (b) the 124,691 undeliverable Email Notices that had an

associated mailing addresses. As of August 14, 2020, a total of 35,684 Postcard Notices were returned by the USPS as undeliverable. Of these: (a) those returned with forwarding addresses noted and were promptly re-mailed to those proposed Settlement Class Members' forwarding address via postage prepaid, first-class U.S. Mail; and (b) for those returned without a forwarding address, Heffler researched the names and addresses through LexisNexis. Postcard Notices were printed and mailed to the 25,692 for which an updated address was so obtained. Those for which an updated address was not obtained through LexisNexis (or were returned by the USPS as undeliverable after LexisNexis research) are deemed "unlocatable" and no further processing was or will be performed, as is customary in many class action settlements.

MAGAZINES

15. Based on the key insight data from MRI, the magazine below was selected for its coverage and index¹ against the target audience characteristics.

¹ Index is a media metric that describes a target audience's inclination to use a given outlet. An index over 100 suggests a target population's inclination to use a medium to a greater degree than the rest of the population. For example, an index of 110 would mean that the target is 10 percent more likely than the rest of the population to use a medium.

16. *People Magazine* is a weekly magazine with national circulation of 3,031,829 with more than 33,926,167 readers². Alone, this magazine reaches 17 percent of adults who have stayed at an IHG hotel, and these readers are nearly 10 percent more likely than the general population to read this title. The Publication Notice was published in *People Magazine* once as half-page, black and white ad with a Spanish sub-head on June 26, 2020.

17. Attached as **Exhibit C** is a tear sheet of the magazine ad.

ONLINE DISPLAY

18. This campaign employed a programmatic approach³ across multi-channel and inventory sources including a collection of premium quality partner web properties targeting “*people who have visited Crowne Plaza, Holiday Inn, or Holiday Inn Express hotels*” via mobile devices that were connected to or have pinged WIFI in or around hotel locations. A total of over 54 million online display

² Magazines report pass-along factors. These are individuals in addition to the subscriber that read a given title. Each magazine has specific pass-along factor. *People Magazine* reports a pass along factor of 11.19.

³ Programmatic refers to computerized media buying of advertising inventory. The mechanics of programmatically serving an online ad are as follows: A user visits a website and the browser sends a request to the publisher’s web server asking for the page’s content (*i.e.*, HTML). An invocation code placed on the page loads an external static ad tracker code. The ad tracker makes a request to the ad server querying for an ad markup (also called creative tag) to be loaded into the ad slot. The ad server responds with the ad markup code (before it’s returned, the ad server executes all targeting/campaign matching logic). Finally, the publisher’s web server returns the information rendering the page’s content with specifically targeted ads to that user.

and social media impressions were served across a whitelist⁴ of pre-vetted websites, multiple exchanges, and the social media platforms Facebook, Instagram, and Twitter.

19. Keyword search targeting was employed to show advertisements to users in their Google search results. A list of search topics including InterContinental Hotels settlement, InterContinental Hotels class action, InterContinental Hotels, Holiday Inn Express, and Candlewood Suites, among others, was applied. We also used pixel retargeting to provide additional reminders for those who have visited the website and did not complete a claim form.

20. Attached as **Exhibit D** are copies of the online display ads.

SOCIAL MEDIA: FACEBOOK, INSTAGRAM AND TWITTER

21. On Facebook and Instagram, we targeted adults between the ages of 25 and 64 and people who have liked, followed or checked in at any IHG brand hotel or resort page (*e.g.*, Holiday Inn, Crowne Plaza, Staybridge Suites). Additionally, we utilized class member records to create a custom audience of known class members to target on these platforms.

⁴ A whitelist is a custom list of acceptable websites where ad content may be served. Creating a whitelist helps to mitigate ad fraud, ensure ads will be served in relevant digital environments to the target audience and helps to ensure that ads will not appear next to offensive or objectionable content.

22. On Twitter, we targeted people who have liked or followed @InterConHotels, @HolidayInn, @CrownePlaza, @Staybridge, among others. Additionally, we utilized class member records to create a custom audience of known class members to target on this platform.

23. Further, the social media campaign included retargeting to users who visited the Settlement website.

24. Attached as **Exhibit E** are copies of the social media ads.

PRESS RELEASE

25. On June 15, 2020, A news release was released over PR Newswire's US1 Newswire. Approximately 154 news mentions of the settlement have resulted thus far from the press release.

26. Attached as **Exhibit F** is a copy of the pickup report.

SETTLEMENT WEBSITE

27. On June 12, 2020, the Settlement Website went live. All aforementioned methods of notice directed class members to this website. The website served as a "landing page for the banner advertising," where Class Members could get information about the Settlement and obtain and/or submit a Claim Form, along with other information which includes information about the class action, their rights, the Long Form Notice, answers to frequently asked questions, contact

information that includes the address for the Claim Administrator and addresses and telephone numbers for Plaintiffs' Counsel, and a downloadable and online version of the Claim Form,; and related information, including the Settlement Agreement, Court Orders, and Plaintiff's Motion for Approval of Fees, Expenses, and Class Representative incentive compensation. As of August 14, 2020, the Settlement Website has received more than 109,300 user sessions and over 180,600 page-views.

TOLL FREE INFORMATION LINE

28. Additionally, Heffler established and continues to maintain a 24-hour toll-free Interactive Voice Response ("IVR") telephone line at 1-833-913-4210, where callers can obtain information about the class action, including, but not limited to, requesting copies of the Long Form Notice or Claim Form.

EXCLUSIONS AND OBJECTIONS

29. Heffler has received twenty-four (27) timely exclusion requests. A list of exclusions is attached hereto as **Exhibit G**. Heffler has not received any objections.

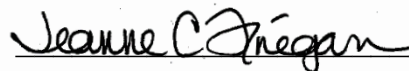
30. Heffler is responsible for receipt and logging of all Claim Forms filed by Class Members. In addition to being able to submit an on-line Claim Form through the Settlement Website, a Class Member may obtain a paper copy of the Claim Form, either through the Settlement Website or by requesting a Claim Form

from Heffler directly and mailing the completed Claim Form to the Settlement P.O. Box. The deadline to submit/postmark a Claim Form is September 12, 2020.

CONCLUSION

31. In my opinion, the outreach efforts described above reflect a particularly appropriate, highly targeted, efficient and effective way to employ notice to this class. Through a multi-media channel approach to notice, which employed direct notice, print, digital, and social and mobile media, an estimated 87 percent of targeted Class Members were reached by the media program, on average, 3.5 times. In my opinion, the efforts used in this notice program consisted of the best contemporary communication standards and methods, were reasonably calculated to provide notice, and are consistent with best practicable court-approved notice programs in similar matters and the Federal Judicial Center's guidelines concerning appropriate reach.

32. I declare under the penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct. Executed on August 21, 2020 in Tigard, Oregon.

A handwritten signature in black ink, reading "Jeanne C. Finegan", is written over a horizontal line.

Jeanne C. Finegan, APR

Exhibit A



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April 23, 2020

VIA FIRST CLASS CERTIFIED MAIL RRR

All Appropriate Federal and State Officials Per 28 U.S.C. § 1715
(see attached distribution list)

Re: CAFA Notice for the Proposed Settlement in *Orr, et al. v. InterContinental Hotels Group, PLC, et al.*, Case No. 1:17-cv-01622-MLB in the United States District Court for the Northern District of Georgia

Ladies and Gentlemen:

Pursuant to Section 3 of the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, Defendants Inter-Continental Hotels Corporation and InterContinental Hotels Group Resources, Inc. (“Defendants” or “IHG”) hereby notify you of the proposed settlement of the above-captioned action (the “Action”) currently pending in the United States District Court for the North District of Georgia (the “Court”).

28 U.S.C. § 1715(b) lists eight items that must be provided to you in connection with any proposed class action settlement. Each of these items is addressed below:

1. 28 U.S.C. § 1715 (b)(1) - a copy of the complaint and any materials filed with the complaint and any amended complaints.

The Class Action Complaint, First Amended Class Action Complaint, Second Amended Class Action Complaint are provided in electronic form on the enclosed CD as **Exhibit A, A1, and A2**, respectively.

2. 28 U.S.C. § 1715 (b)(2) - notice of any scheduled judicial hearing in the class action.

On April 15, 2020, Plaintiffs filed a motion for preliminary approval of the class action. The motion date has not been set. A Final Approval Hearing date has not been set. A copy of the Plaintiffs’ Motion for Preliminary Approval of Class Action and Proposed Preliminary Approval Order are provided in electronic form on the enclosed CD as **Exhibit B and B1**, respectively.

Atlanta Chicago Cincinnati Cleveland Columbus Costa Mesa Dallas Denver Houston
Los Angeles New York Orlando Philadelphia San Francisco Seattle Washington, DC

April 23, 2020

Page 2

3. 28 U.S.C. § 1715(b)(3) - any proposed or final notification to Class Members.

A copy of the proposed Postcard Notice, Long Form Notice and Email Notice of Settlement that will be provided to Class Members by first-class mail and/or email and that will be available on the website created for the administration of this matter are provided in electronic form on the enclosed CD as **Exhibit C, C1, and C2** respectively. The Notices describe among other things, claim submission and the Class Members' rights to object or exclude themselves from the Class.

4. 28 U.S.C. § 1715(b)(4) - any proposed or final class action settlement.

The Settlement Agreement is provided in electronic form on the enclosed CD as **Exhibit D**.

5. 28 U.S.C. § 1715(b)(5) - any settlement or other agreement contemporaneously made between class counsel and counsel for defendants.

There are no other settlements or other agreements between Class Counsel and counsel for Defendants beyond what is set forth in the Agreement.

6. 28 U.S.C. § 1715(b)(6) - any final judgment or notice of dismissal.

The Court has not yet entered a final judgment or notice of dismissal. Accordingly, no such document is presently available. A copy of the Proposed Final Approval Order and Entry of Judgment is provided in electronic form on the enclosed CD as **Exhibit E**.

7. 28 U.S.C. § 1715(b)(7) – (A) If feasible, the names of class members who reside in each State and the estimated proportionate share of the claims of such members to the entire settlement to that State's appropriate State official; or (B) if the provision of the information under subparagraph (A) is not feasible, a reasonable estimate of the number of class members residing in each State and the estimated proportionate share of the claims of such members to the entire settlement.

The definition of the settlement class in the proposed Settlement Agreement includes all persons who reside in the United States and used their credit or debit card at the front desk of an IHG-Branded Hotel location, or used their credit or debit card at a restaurant or bar on an IHG-managed hotel or property as set forth at the locations and during the class period in **Exhibit F**, an attachment to the agreement that sets forth the affected window periods at each location. The identity and state of residence for all of the settlement class members is not known. Attached as **Exhibit F1** is an estimated breakdown by state for known Class Members.

April 23, 2020

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8. 28 U.S.C. § 1715(b)(8) - any written judicial opinion relating to the materials described in 28 U.S.C. § 1715(b) subparagraphs (3) through (6).

There has been no written judicial opinion. Accordingly, no such document is presently available.

If you have any questions about this notice, the Action, or the enclosed materials, please contact the undersigned counsel for Defendants listed below.

Sincerely,



David Carney

SERVICE LIST FOR CAFA NOTICE

U.S. Attorney General

William Barr
Attorney General
950 Pennsylvania Avenue
Washington, DC 20530-0001

Alabama Attorney General

Steve Marshall
501 Washington Ave
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Montgomery, AL 36130-0152

Alaska Attorney General

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Anchorage, AK 99501-1994

American Samoa Attorney General

Mitzie Jessop Tassae
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Arkansas Attorney General

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Sacramento, CA 95814-2919

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Ralph L. Carr Colorado Judicial Center
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Wilmington, DE 19801

District of Columbia Attorney General

Karl Racine
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Washington, DC 20001

Florida Attorney General

Ashley Moody
The Capitol, PL-01
Tallahassee, FL 32399-1050

Georgia Attorney General

Chris Carr
40 Capitol Square, SW
Atlanta, GA 30334-1300

Guam Attorney General

Leevin Taitano Camacho
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Tamuning, Guam 96913

Hawaii Attorney General

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Honolulu, HI 96813

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Indianapolis, IN 46204

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1305 E. Walnut Street
Des Moines, IA 50319

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Frankfort, KY 40601

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Jackson, MS 39201

Missouri Attorney General

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Supreme Ct. Bldg.
207 W. High St., P.O. Box 899
Jefferson City, MO 65102

Montana Attorney General

Tim Fox
Justice Bldg.
215 N. Sanders Street
Helena, MT 59620-1401

Nebraska Attorney General

Doug Peterson
2115 State Capitol
Lincoln, NE 68509-8920

Nevada Attorney General

Aaron Ford
100 N. Carson St.
Carson City, NV 89701

New Hampshire Attorney General

Gordon MacDonald
33 Capitol St.
Concord, NH 03301

New Jersey Attorney General

Gurbir S. Grewal
RJ Hughes Justice Complex
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Trenton, NJ 08625-0080

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Santa Fe, NM 87501

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Office of the Attorney General
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Albany, NY 12224

North Carolina Attorney General

Josh Stein
9001 Mail Service Center
Raleigh, NC 27699-9001

North Dakota Attorney General

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Bismarck, ND 58505-0040

Northern Mariana Islands Attorney General

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Oklahoma Attorney General

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Oregon Attorney General

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Salem, OR 97301-4096

Pennsylvania Attorney General

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Puerto Rico Attorney General

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San Juan, PR 00902-0192

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Columbia, SC 29211

South Dakota Attorney General

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Josh Kaul

Wisconsin Department of Justice

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Madison, WI 53707-7857

Wyoming Attorney General

Bridget Hill

Kendrick Building

2320 Capitol Avenue

Cheyenne, WY 82002

Exhibit B

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

If You Used a Credit or Debit Card at an InterContinental Hotels Group (IHG) Branded Hotel Location Between August 1, 2016 and December 29, 2016, You Could Get Money from a Class Action Settlement.

A federal court ordered this Notice. This is not a solicitation from a lawyer.

Si desea recibir esta notificación en español, llámenos o visite nuestra página web.

- A Settlement has been reached in a class action lawsuit involving malware intrusions that affected certain Inter-Continental Hotels Corporation and InterContinental Hotels Group Resources, Inc. (“IHG”)-branded hotel, restaurant and bar locations at varying times between August 1, 2016 through December 29, 2016 (the “Data Security Incidents”).
- The affected hotel brands include InterContinental, Holiday Inn, Holiday Inn Express & Suites, Candlewood Suites, Crowne Plaza, Staybridge Suites, and Hotel Indigo. The specific hotel locations and time frames during which the IHG-branded hotel, restaurant, and bar locations were affected by the Data Security Incidents are available at **www.IHGdatasecuritysettlement.com**.
- The Settlement includes all persons who reside in the United States and used a payment card at the front desk of an affected hotel location or to make or attempt to make a purchase at an affected restaurant or bar location identified at the website **www.IHGdatasecuritysettlement.com** during the period in which that hotel, restaurant, or bar was affected by the Data Security Incidents.
- The Settlement provides for payments to people who submit valid claims for documented out-of-pocket expenses of up to \$250 that either of the Data Security Incidents was a contributing factor to the expense being incurred, and for reimbursement of documented fraudulent and unauthorized losses of up to \$3,500 that were more likely than not caused by the Data Security Incidents. The total payments to the class are capped at \$1,550,000.

**Your legal rights are affected even if you do nothing.
Read this Notice carefully.**

Your Legal Rights & Options in this Settlement		
Submit a Claim	You must submit a claim to get a payment.	Deadline September 12, 2020.
Ask to be Excluded	This allows you to sue IHG over the claims resolved by this Settlement. You will not get anything from this Settlement.	Deadline August 12, 2020.
Object	Write to the Court about why you do not like the Settlement. You can still get a payment.	Deadline August 12, 2020.
Do Nothing	You get no payment and you give up rights.	

- These rights and options – **and the deadlines to exercise them** – are explained in this notice.
- The Court in charge of this case still has to decide whether to grant final approval of the Settlement. Payments will only be made after the Court grants final approval of the Settlement and after any appeals are resolved in favor of the Settlement.

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BASIC INFORMATION

1. Why was this Notice issued?

The Court authorized this notice because you have a right to know about the proposed Settlement in this class action lawsuit and about all of your options before the Court decides whether to give “final approval” to the Settlement. This notice explains the legal rights and options that you may exercise before the Court decides whether to approve the Settlement.

Judge Michael L. Brown of the United States District Court for the Northern District of Georgia is overseeing this case. The case is known as *Orr, et al. v. InterContinental Hotels Group, PLC, et al.*, No. 17-cv-01622-MLB. The persons who sued are called the Plaintiffs. IHG are called the Defendants.

2. What is this lawsuit about?

The lawsuit claims that IHG was responsible for the Data Security Incidents that occurred, and asserts claims such as: negligence, negligence per se, breach of implied contract, and unjust enrichment. The lawsuit seeks compensation for people who had losses as a result of the Data Security Incidents.

IHG denies all of the Plaintiffs’ claims and says it did not do anything wrong, but was the victim of a sophisticated malware intrusion.

3. Why is this lawsuit a class action?

In a class action, one or more people called “Representative Plaintiffs” sue on behalf of all people who have similar claims. All of these people together are the “Settlement Class” or “Settlement Class Members.” In this case, the Representative Plaintiffs means David Orr, Henry Chamberlain, Angela Mickel, and Jennifer Grady. One court resolves the issues for all Settlement Class Members, except for those who exclude themselves from the Settlement Class.

4. Why is there a Settlement?

By agreeing to settle, both sides avoid the cost and risk of a trial, and people who submit valid claims will get compensation. The Representative Plaintiffs and their attorneys believe the Settlement is fair, reasonable, and adequate and, thus, best for the Settlement Class and its members. The Settlement does not mean that IHG did anything wrong.

WHO IS IN THE SETTLEMENT?

5. How do I know if I am included in the Settlement?

You are included in the Settlement if you reside in the United States and used a credit or debit card at the front desk of an affected hotel location or to make or attempt to make a purchase at an affected restaurant or bar location identified at the website **www.IHGdatasecuritysettlement.com** during the period in which that hotel, restaurant, or bar was affected by the Data Security Incidents.

Specifically excluded from the Settlement Class are: (a) individuals who are or were during the Data Security Incidents officers or directors of IHG; and (b) any justice, judge, magistrate judge, or law clerk of the Court, the United States Court of Appeals for the Eleventh Circuit, and the U.S. Supreme Court.

6. What if I am not sure whether I am included in the Settlement?

If you are not sure whether you are included in the Settlement, you may:

1. Call 1-833-913-4210 with questions, or
2. visit **www.IHGdatasecuritysettlement.com**.
3. You may also write with questions to:

IHG Data Security Settlement
c/o Settlement Administrator
P.O. Box 8247
Philadelphia, PA 19101-8247.

Please do not contact the Court with questions.

THE SETTLEMENT BENEFITS

7. What does the Settlement provide?

The Settlement will provide payments to people who submit valid claims for (1) Expense Reimbursement, and/or (2) Fraudulent and Unauthorized Charges Reimbursement. The total payments to the class are capped at \$1,550,000.

8. What payments are available for Expense Reimbursement?

Settlement Class Members are eligible to receive expense reimbursement of up to \$250 (in total) for the following categories of out-pocket expenses:

- Unreimbursed bank fees;
- Unreimbursed card reissuance fees;
- Unreimbursed overdraft fees;
- Unreimbursed charges related to unavailability of funds;
- Unreimbursed late fees;
- Unreimbursed over-limit fees;
- Long distance telephone charges;
- Cell minutes (if charged by the minute);
- Internet usage charges (if charged by the minute or the amount of data usage);
- Text messages (if charged by the message);
- Unreimbursed charges from banks or credit card companies;
- Postage and shipping charges;
- Interest on payday loans due to card cancelation or due to over-limit situation;
- Cost for obtaining credit reports, and payments for obtaining or removing credit freezes and financial account freezes;
- Costs of credit monitoring and identity theft protection (up to \$75) purchased and paid for any time from August 1, 2016, through and including **September 12, 2020**; and

- Reimbursement of up to four hours of documented lost time (at \$20 per hour) spent dealing with replacement card issues, updating automatic payments associations, contesting fraudulent charges, and otherwise dealing with the Data Security Incidents.

Reasonable documentation must be submitted with your Claim Form showing that either of the Data Security Incidents was a contributing factor to the expense being incurred. More details are provided in the Settlement Agreement, which is available at **www.IHGdatasecuritysettlement.com**.

9. What payments are available for Fraudulent and Unauthorized Charges Reimbursement?

Settlement Class Members are eligible to receive reimbursement of actual unreimbursed losses due to fraudulent activity or unauthorized charges of up to \$3,500 per Settlement Class Member.

Reasonable documentation must be submitted with your Claim Form showing that the charge was more likely than not caused by the Data Security Incidents. More details are provided in the Settlement Agreement, which is available at **www.IHGdatasecuritysettlement.com**.

10. Can I submit claims for both types of Expenses?

Yes, you can submit claims for both Expense Reimbursement and Fraudulent and Unauthorized Charges Reimbursement.

HOW TO GET BENEFITS

11. How do I get benefits?

To get payment from the Settlement, you must complete a Claim Form. Please read the instructions carefully, fill out the Claim Form, provide reasonable documentation, and mail it postmarked no later than **September 12, 2020** to:

IHG Data Security Settlement
c/o Settlement Administrator
P.O. Box 8247
Philadelphia, PA 19101-8247

Claim Forms are available at **www.IHGdatasecuritysettlement.com** or you may request one by mail by calling 1-833-913-4210.

12. How will claims be decided?

The Settlement Administrator will initially decide whether the information provided on a Claim Form is complete and valid. The Settlement Administrator may require additional information from any claimant. If the required information is not provided timely, the claim will be considered invalid and will not be paid.

If the claim is complete and the Settlement Administrator denies the claim entirely or partially, the claimant will be provided an opportunity to correct deficiencies identified by the Settlement Administrator.

REMAINING IN THE SETTLEMENT

13. Do I need to do anything to remain in the Settlement?

You do not have to do anything to remain in the Settlement, but if you want a payment, you must submit a Claim Form postmarked by **September 12, 2020**.

14. What am I giving up as part of the Settlement?

If the Settlement becomes final, you will give up your right to sue IHG for the claims being resolved by this Settlement. The specific claims you are giving up against IHG are described in Section 1.15, 1.16, 1.23 of the Settlement Agreement. You will be releasing IHG and all related people or entities as described in Section 6 of the Settlement Agreement. The Settlement Agreement is available at **www.IHGdatasecuritysettlement.com**.

The Settlement Agreement describes the released claims with specific descriptions, so read it carefully. If you have any questions you can talk to the law firms listed in Question 18 for free or you can, of course, talk to your own lawyer at your own expense.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want a payment from this Settlement, but you want to keep the right to sue IHG about issues in this case, then you must take steps to get out of the Settlement Class. This is called excluding yourself from – or is sometimes referred to as “opting out” of – the Settlement Class.

15. If I exclude myself, can I get a payment from this Settlement?

No. If you exclude yourself, you will not be entitled to any benefits of the Settlement. You will also not be bound by any judgment in this case.

16. If I do not exclude myself, can I sue IHG for the same thing later?

No. Unless you exclude yourself, you give up any right to sue IHG for the claims that this Settlement resolves. You must exclude yourself from the Settlement Class to start your own lawsuit or to be part of any different lawsuit relating to the claims in this case. If you exclude yourself, do not submit a Claim Form to ask for a payment.

17. How do I exclude myself from the Settlement?

To exclude yourself, send a letter that says you want to be excluded from the Settlement in *Orr, et al. v. InterContinental Hotels Group, PLC, et al.*, Case No. 17-cv-01622-MLB. Include your name, address, and signature. You must mail your Exclusion Request postmarked by **August 12, 2020** to:

IHG Settlement Exclusions
c/o Settlement Administrator
P.O. Box 8247
Philadelphia, PA 19101-8247

THE LAWYERS REPRESENTING YOU

18. Do I have a lawyer in this case?

Yes. The Court appointed the following lawyers as Lead Class Counsel: Ben Barnow and Erich P. Schork, Barnow and Associates, P.C., and David J. Worley, Evangelista Worley LLC.

You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

19. How will the lawyers be paid?

Lead Class Counsel will request the Court's approval of an award for attorneys' fees and reasonable costs and expenses of \$550,000. Lead Class Counsel will also request approval of incentive awards of \$1,500 for each of the Representative Plaintiffs. Any amount that the Court awards for attorneys' fees, costs, expenses, and incentive awards will be paid separately by IHG and will not reduce the amount of payments to Settlement Class Members who submit valid claims.

OBJECTING TO THE SETTLEMENT

You can tell the Court that you do not agree with the Settlement or some part of it.

20. How do I tell the Court that I do not like the Settlement?

You can object to the Settlement if you do not like it or some part of it. The Court will consider your views. To do so, you must file a written objection in this case, *Orr, et al. v. InterContinental Hotels Group, PLC, et al.*, No 17-cv-01622-MLB, with the Clerk of the Court at the address below.

Your objection must include all of the following information:

- (1) The objector's full name, address, and email address (if any);
- (2) Information identifying the objector as a Settlement Class Member, including proof that they are a member of the Settlement Class;
- (3) A written statement of all grounds for the objection, accompanied by any legal support for the objection;
- (4) The identity of all counsel representing the objector;
- (5) The identity of all counsel representing the objector who may appear at the Final Fairness Hearing;
- (6) All other cases in which the objector (directly or through counsel) has filed an objection to any proposed class action settlement, has been a named plaintiff in any class action, or has served as proposed or class counsel, including the case name, court, and docket number for each;
- (7) A list of all persons who will be called to testify at the Final Fairness Hearing in support of the objection;
- (8) A list of all persons who will be called to testify at the Final Fairness Hearing in support of the objection;

- (9) A statement confirming whether the objector intends to personally appear or testify at the Final Fairness Hearing; and
- (10) The objector's signature or the signature of the objector's duly authorized attorney or other duly authorized representative (along with documentation setting forth such representation).

Your objection must be filed no later than **August 12, 2020** to:

Clerk of the Court
 United States District Court, Northern District of Georgia
 Richard B. Russell Federal Building
 2211 United States Courthouse
 75 Ted Turner Drive, SW
 Atlanta, GA 30303-3309

In addition, you must **mail** a copy of your objection to Lead Class Counsel and Defense Counsel, postmarked no later than **August 12, 2020**:

LEAD CLASS COUNSEL	Lead Class COUNSEL	Defense Counsel
Erich P. Schork Barnow and Associates, P.C. 205 West Randolph Street Suite 1630 Chicago, IL 60606	David J. Worley Evangelista Worley, LLC 500 Sugar Mill Road Building A, Suite 245 Atlanta, GA 30350	David A. Carney Baker & Hostetler, LLP 127 Public Square Suite 2000 Cleveland, OH 44114

21. What is the difference between objecting and asking to be excluded?

Objecting is telling the Court that you do not like the Settlement and why you do not think it should be approved. You can object only if you do not exclude yourself from the Settlement Class. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class. If you exclude yourself, you have no basis to object because the case no longer affects you.

THE COURT'S FINAL FAIRNESS HEARING

The Court will hold a hearing to decide whether to grant final approval of the Settlement.

22. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Fairness Hearing at 10:00 a.m. on **September 2, 2020**, in Courtroom 1906 at the Richard B. Russell Federal Building, United States District Court, 75 Ted Turner Drive, SW, Atlanta, GA. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check **www.IHGdatasecuritysettlement.com** or call 1-833-913-4210.

At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are timely objections, the Court will consider them and will listen to people who have asked to speak at the hearing if such a request has been properly made. The Court will also rule on the request for an award of attorneys' fees, costs, and expenses, as well as the request for incentive awards for the Representative Plaintiffs. After the hearing, the Court will decide whether to approve the Settlement. We do not know how long these decisions will take.

23. Do I have to attend the hearing?

No. Lead Class Counsel will present the Settlement Agreement to the Court. You or your own lawyer are welcome to attend at your expense, but you are not required to do so. If you send an objection, you do not have to come to the Court to talk about it. As long as you filed your written objection on time with the Court and mailed it according to the instructions provided in Question 20, the Court will consider it.

24. May I speak at the hearing?

You may ask the Court for permission to speak at the Final Fairness Hearing. To do so, you must file an objection according to the instructions in Question 20, including all the information required.

Your Objection must be **filed** with the Clerk of the Court for United States District Court for the Northern District of Georgia no later than **August 12, 2020**. In addition, you must **mail** a copy of your objection to both Lead Class Counsel and Defense Counsel listed in Question 20, postmarked no later than **August 12, 2020**.

IF YOU DO NOTHING

25. What happens if I do nothing?

If you do nothing, you will get no benefits from this Settlement. Once the Settlement is granted final approval and the judgment becomes final, you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against IHG about the legal issues in this case, ever again.

You must exclude yourself from the Settlement if you want to retain the right to sue IHG for the claims resolved by this Settlement.

GETTING MORE INFORMATION

26. How do I get more information?

This Notice only provides a summary the proposed Settlement. Complete details about the Settlement can be found in the Settlement Agreement available at **www.IHGdatasecuritysettlement.com**.

You may also:

1. Write to:
IHG Data Security Settlement
c/o Settlement Administrator
P.O. Box 8247
Philadelphia, PA 19101-8247
2. Visit the Settlement website at **www.IHGdatasecuritysettlement.com**
3. Call the toll-free number 1-833-913-4210.

From: No Reply

To:

Subject: Notice of IHG Data Security Class Action Settlement

Class Member ID: 31131SAMPLE12

If You Used a Credit or Debit Card at an InterContinental Hotels Group (IHG) Branded Hotel Location Between August 1, 2016 and December 29, 2016, You Could Get Money from a Class Action Settlement.

Si desea recibir esta notificación en español, llámenos o visite nuestra página web.

A Settlement has been reached in a class action lawsuit involving malware intrusions that affected certain Inter-Continental Hotels Corporation and InterContinental Hotels Group Resources, Inc. (IHG)-branded hotel, restaurant and bar locations between August 1, 2016 through December 29, 2016 (the “Data Security Incidents”). The affected hotel brands include InterContinental, Holiday Inn, Holiday Inn Express & Suites, Candlewood Suites, Crowne Plaza, Staybridge Suites, and Hotel Indigo. The specific locations and time frames during which the IHG-branded hotel, restaurant, and bar locations were affected by the Data Security Incidents are available at www.IHGdatasecuritysettlement.com.

Who is Included?

You are included in the Settlement if you reside in the United States and used a credit or debit card at the front desk of an affected hotel location or to make or attempt to make a purchase at an affected restaurant or bar location identified at the website www.IHGdatasecuritysettlement.com during the period in which that hotel, restaurant or bar was affected by the Data Security Incidents.

What can I get from the Settlement?

The Settlement provides for payments to people who submit valid claims for documented out-of-pocket expenses of up to \$250 that either of the Data Security Incidents was a contributing factor to the expense being incurred, and for reimbursement of documented fraudulent and unauthorized losses of up to \$3,500 that were more likely than not caused by the Data Security Incidents. The total payments to the class are capped at \$1,550,000.

How do I get a payment?

The only way to qualify for a payment is to submit a valid Claim Form online or postmarked no later than **September 12, 2020**. You can file a claim online at www.IHGdatasecuritysettlement.com or call **1-833-913-4210** to request that a Claim Form be mailed to you.

What are my Rights?

Do Nothing: If you do nothing, you will remain in the Settlement Class, but you will not be eligible for benefits, and you will be bound by the decisions of the Court and give up your rights to sue IHG for the claims resolved by this Settlement. **Object to the Settlement:** You can stay in the Settlement Class and object to the Settlement for any reason. Objections must be filed with the Clerk of Court for the United States District Court for the Northern District of Georgia by **August 12, 2020**. **Exclude Yourself:** If you do not want to be legally bound by the Settlement and wish to retain the right to sue IHG, you must request to be excluded by **August 12, 2020**. Detailed instructions on how to object or exclude yourself can be found at **www.IHGdatasecuritysettlement.com**.

On **September 2, 2020**, the Court will hold a Final Fairness Hearing to determine whether to approve the Settlement, Class Counsel's request for attorneys' fees and reasonable costs and expenses of \$550,000, and an Incentive Award of \$1,500 for each of the Representative Plaintiffs. The final approval motion and motion for attorneys' fees and reasonable costs and expenses will be posted on the Settlement website after they are filed. You or your lawyer may attend the hearing at your own cost, but you do not have to.

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www.IHGdatasecuritysettlement.com 1-833-913-4210

To unsubscribe from this list, please click here: [Unsubscribe](#)

On v. IHG Settlement

c/o Settlement Administrator

P.O. Box 8247

Philadelphia, PA 19101-8247

First Class Mail

U.S. POSTAGE PAID

CITY, ST

PERMIT NO. XXXX

LEGAL NOTICE

**If You Used a Credit or Debit Card
at an InterContinental Hotels
Group (IHG) Branded Hotel
Location Between August 1, 2016
and December 29, 2016, You Could
Get Money from a Class Action
Settlement.**

**Si desea recibir esta notificación en
español, llámenos o visite nuestra
página web.**

<<Barcode>>

Class Member ID: 31131SAMPLE12

<<FirstName>> <<LastName>>

<<BusinessName>>

<<Address>>

<<Address2>>

<<City>>, <<ST>> <<Zip>>-<<zip4>>

A Settlement has been reached in a class action lawsuit involving malware intrusions that affected certain Inter-Continental Hotels Corporation and InterContinental Hotels Group Resources, Inc. (“IHG”)-branded hotel, restaurant and bar locations between August 1, 2016 through December 29, 2016 (the “Data Security Incidents”). The affected hotel brands include InterContinental, Holiday Inn, Holiday Inn Express & Suites, Candlewood Suites, Crowne Plaza, Staybridge Suites, and Hotel Indigo. The specific locations and time frames during which the IHG-branded hotel, restaurant, and bar locations were affected by the Data Security Incidents are available at www.IHGdatasecuritysettlement.com.

Who is Included?

You are included in the Settlement if you reside in the United States and used a credit or debit card at the front desk of an affected hotel location or to make or attempt to make a purchase at an affected restaurant or bar location identified at the website www.IHGdatasecuritysettlement.com during the period in which that hotel, restaurant or bar was affected by the Data Security Incidents.

What can I get from the Settlement?

The Settlement provides for payments to people who submit valid claims for documented out-of-pocket expenses of up to \$250 that either of the Data Security Incidents was a contributing factor to the expense being incurred, and for reimbursement of documented fraudulent and unauthorized losses of up to \$3,500 that were more likely than not caused by the Data Security Incidents. The total payments to the class are capped at \$1,550,000.

How do I get a payment?

The only way to qualify for a payment is to submit a valid Claim Form online or postmarked no later than **September 12, 2020**.

You can file a claim online at www.IHGdatasecuritysettlement.com or call **1-833-913-4210** to request that a Claim Form be mailed to you.

What are my Rights?

Do Nothing: If you do nothing, you will remain in the Settlement Class, but you will not be eligible for benefits, and you will be bound by the decisions of the Court and give up your rights to sue IHG for the claims resolved by this Settlement. **Object to the Settlement:** You can stay in the Settlement Class and object to the Settlement for any reason. Objections must be filed with the Clerk of Court for the United States District Court for the Northern District of Georgia by **August 12, 2020**. **Exclude Yourself:** If you do not want to be legally bound by the Settlement and wish to retain the right to sue IHG, you must request to be excluded by **August 12, 2020**. Detailed instructions on how to object or exclude yourself can be found at www.IHGdatasecuritysettlement.com.

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This is only a summary. For additional information including the Claim Form, the Settlement Agreement, how to file an objection, and Frequently Asked Questions call **1-833-913-4210** or visit www.IHGdatasecuritysettlement.com.

Postage
Required

Orr v IHG Settlement
c/o Settlement Administrator
P.O. Box 8247
Philadelphia, PA 19101-8247

<<Barcode>>
Class Member ID: 31131SAMPLE12

Address Update

If you have an address different from where this postcard was mailed to, please write your correct address and email below and return this portion to the address provided on the other side

DO NOT USE THIS POSTCARD TO FILE A CLAIM, AN EXCLUSION OR OBJECTION.

Name: _____
First Name M.I. Last Name

Street Address: _____

Street Address 2: _____

City: _____ State: _____ Zip Code: _____

Email Address: _____@_____

Claim Form

**MUST BE
SUBMITTED
NO LATER THAN
September 12, 2020**

**Orr v. Inter-Continental Hotels Corp. and
InterContinental Hotels Group Resources, Inc.**

For Office Use Only

This Claim Form should be filled out online or submitted by mail if you (1) reside in the United States and (2) used a credit or debit card at the front desk of an affected hotel location, or to make or attempt to make a purchase at an affected restaurant or bar location, during the time periods identified at www.IHGdatasecuritysettlement.com. The time frames during which the different hotel, restaurant, and bar locations were affected by the Data Security Incidents are posted on the Settlement administration website. These affected time periods vary by location but are all between August 1, 2016, and December 29, 2016. You may receive a check if you fill out this Claim Form, the Settlement is approved, and you are found to be eligible for a payment.

The Settlement Notice describes your legal rights and options. Please visit the official Settlement administration website, www.IHGdatasecuritysettlement.com, or call 1- 833-913-4210 for more information.

This Claim Form may be submitted online at www.IHGdatasecuritysettlement.com or completed and mailed to the address below. If you wish to submit a Claim Form for a Settlement payment, you need to provide the information requested below. Please print clearly in blue or black ink. Online Claim Forms must be submitted on or before **September 12, 2020**. Claim Forms, including supporting documentation, submitted by mail must be postmarked by **September 12, 2020** and mailed to:

IHG Data Breach Settlement
c/o Settlement Administrator
P.O. Box 8247
Philadelphia, PA 19101-8247

I. CLAIMANT INFORMATION

The Settlement Administrator will use this information for all communications regarding this Claim Form and the Settlement. If this information changes before the Settlement benefits are issued, you must notify the Settlement Administrator in writing at the address above.

First Name

M.I.

Last Name

Mailing Address, Line 1: Street Address/P.O. Box

Mailing Address, Line 2

City

State

Zip Code

Email Address

(____) ____ - ____
Telephone Number (Home)

(____) ____ - ____
Telephone Number (Mobile)

II. PAYMENT ELIGIBILITY

Section A:

If you received a postcard or email notifying you about the Settlement Agreement, please enter the Class Member ID that was included in your postcard or email notice here:

3 1 1 3 6 _ _ _ _ _

If you received notice of this settlement through a publication or through a website please identify the affected IHG-branded hotel, restaurant, or bar location and the approximate date(s) of your stay(s) and/or purchases or attempted purchases on the lines below:

Hotel/Restaurant: _____

Date(s) of Stay(s)/Purchase(s): _____

Section B:

Please select benefit payment option for valid claims:

☐ Electronic Payment ☐ Check

If "Electronic Payment" is selected, you will receive an email after Final Approval with a list of available payment options. You MUST include your Email Address in Section I.

III. BENEFIT SELECTION

Expense Reimbursement. If you wish to receive reimbursement (up to \$250) for expenses or lost time incurred as a result of the Data Security Incidents, check the relevant box below, fill in the total amount you are claiming for each category, sign the attestation at the end of this Claim Form, and attach supporting documentation as described in **bold type** (if you are asked to provide account statements as part of proof required for any part of your claim, you may mark out any unrelated transactions if you wish). **By checking the box(es) and signing the attestation below, you are affirming that to the best of your knowledge and belief either of the Data Security Incidents was a contributing factor to the expense being incurred.**

☐

Bank Fees. Unreimbursed card replacement fees, card reissuance fees, overdraft fees, over-the-limit fees, charges related to the unavailability of funds, or late fees

Total amount for this category \$ _____

Attach a copy of a bank or credit card statement or other proof of the fees or charges.

☐

Phone/Internet Charges. Long distance phone charges, cell phone charges (only if charged by the minute), Internet usage charges (only if charged based on the amount of data usage or if charged by the minute) or text message charges (if charged by the message).

Total amount for this category \$ _____

Attach a copy of the bill from your telephone or mobile phone company, a bill from your Internet service provider, or other documentation that shows the charges.

☐

Postage/Shipping. Postage and shipping charges.

Total amount for this category \$ _____

Attach a copy of all postage or shipping expenses.

☐

Interest. Interest on payday loans due to card cancelation or due to over-the-limit situation.

Total amount for this category \$ _____

Attach bills, receipts, or other documentation showing the charges.

☐

Credit Reports/Freezes. Amounts paid to obtaining credit report(s) and obtaining or removing credit freezes and financial account freezes.

Total amount for this category \$ _____

Attach receipts, invoices, or other documentation showing the amounts paid.

☐

Credit Monitoring Costs. Costs of credit monitoring (up to \$75) purchased and paid for any time during the period from August 1, 2016 through and including **September 12, 2020**.

Total amount for this category \$ _____

Attach a copy of a receipt or other proof of purchase for credit monitoring purchased.

☐

Lost Time. Reimbursement for lost time up to 4 hours at \$20.00/hour for time spent dealing with replacement card issues, updating automatic payment associations, contesting fraudulent charges, and otherwise dealing with the Data Security Incidents.

Total number of hours claimed _____

If the time was spent online or on the telephone, briefly describe what you did. If the time was spent updating accounts due to your card being reissued, identify the other accounts that had to be updated.

Fraudulent and Unauthorized Charges Reimbursement. If you wish to receive reimbursement of actual unreimbursed losses due to fraudulent activity or unauthorized charges (up to \$3,500) that were more likely than not caused by the Security Incidents, check the relevant box below, describe the unreimbursed losses claimed (including the amount of each loss), sign the attestation at the end of this Claim Form, and attach supporting documentation (if you are asked to provide account statements as part of proof required for any part of your claim, you may mark out any unrelated transactions if you wish). **By checking the box and signing the attestation below, you are affirming that to the best of your knowledge and belief the claimed losses were more likely than not caused by the Data Security Incidents.**

Describe all actual unreimbursed losses due to fraudulent activity or other unauthorized charges (including the amount of each loss and the total amount claimed) more likely than not caused by the Data Security Incidents.

This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

Attach documentation showing that the claimed loses were more likely than not caused by the Data Security Incidents.

IV. SIGNATURE

SIGNATURE: _____

DATED: _____ / _____ / _____

Exhibit C

At Home with
Andrew Cuomo &
His 3 Daughters



Secret Celebrity
WEDDINGS!



Heather
Locklear
**HAPPY, SOBER
& ENGAGED**


**NEW FAMILY
PHOTOS!**



**Princess Kate
Steps Up**

The Pressure to Be Perfect

With Harry and Meghan's exit,
the future Queen and royal mom
of 3 takes center stage—and
fights back against new criticism

July 6, 2020

\$5.99



Legal Notice

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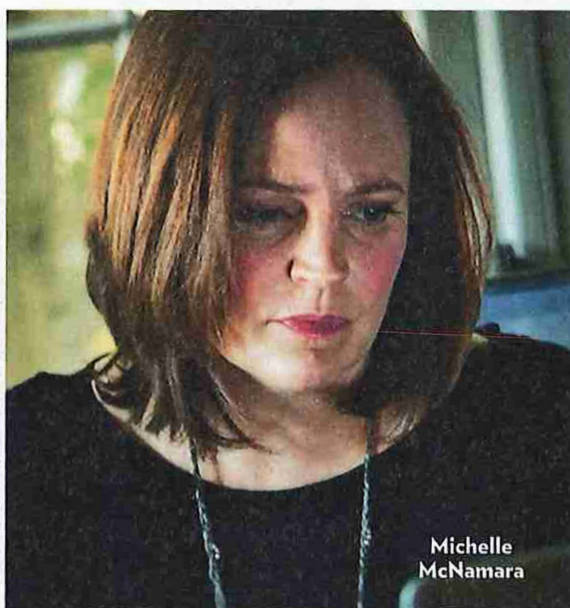
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www.IHGdatasecuritysettlement.com
1-833-913-4210

People picks

TV | I'll Be Gone in the Dark

CRIME Directed by Liz Garbus, this docuseries settles in like a nightmare. It's based on the best-selling book by Michelle McNamara, comedian Patton Oswalt's wife, who died two years before its 2018 publication. She was fascinated—obsessed—by the so-called Golden State Killer, responsible for 12 deaths and more than 50 rapes. (A former cop was arrested as a suspect just as the series started filming.) *Dark* is about her hunt for evidence, but it's also about a whole realm of true-crime devotees, pursuing justice into the shadows. (HBO, June 28, 10 p.m.)



Michelle McNamara

The Politician's Rahne Jones

After quitting a job in Homeland Security, Rahne Jones was ready to "make a change." The Maryland native landed her first major gig as Ben Platt's running mate, Skye Leighton, on the Netflix comedy *The Politician*, which has just launched season 2. "It's been surreal," says Jones, 33.

—CHRISTINA DUGAN



Exhibit D

If you used a Credit or Debit Card at an

IHG InterContinental Hotels Group Branded Hotel Location



Between August 1, 2016
and December 29, 2016

YOU COULD GET MONEY FROM A SETTLEMENT.

LEARN MORE >>

**If you used a Credit
or Debit Card at an**

**IHG InterContinental
Hotels Group
Branded Hotel
Location**




Between August 1, 2016
and December 29, 2016

YOU COULD GET MONEY
FROM A SETTLEMENT.


LEARN MORE >>

Exhibit E



Legal Notices
Sponsored


If you used a Credit or Debit Card at an InterContinental Hotels Group (IHG) branded hotel location between August 1, 2016 and December 29, 2016, you could get money from a class action settlement. [See More](#)



IHGDATASECURITYSETTLEM...


IHG Data Breach Settlement

[LEARN MORE](#)



Legal Notices
Sponsored

If you used a Credit or Debit Card at an InterContinental Hotels Group (IHG) branded hotel location between August 1, 2016 and December 29, 2016, you could get money from a class action settlement.



IHGDATASECURITYSETTLEMENT.COM

IHG Data Breach Settlement

[Learn More](#)

Exhibit F

If You Used a Credit or Debit Card at an InterContinental Hotels Group (IHG) Branded Hotel Location Between August 1, 2016 and December 29, 2016, You Could Get Money from a Class Action Settlement.

English

PR Newswire ID: 2828748-1 Clear Time Jun 15, 2020 9:17 AM ET

Pickup

Where did my release get picked up?

154	113,257,011
total pickup	total potential audience

Traffic

What traffic did my release generate?

4,841	543
release views	release web crawler hits

Audience

Who are the audiences viewing my release?

60	119	1,035
media views	organization views	Associated Press outlets

Engagement

How are people engaging with my release?

744
total engagement actions

8	736
shares	click-throughs

Industry Benchmarks

On a scale of 1 - 100, how this release performed compared to other similar releases.

56

total visibility

78

pickup

68

traffic

23

audience

100

engagement

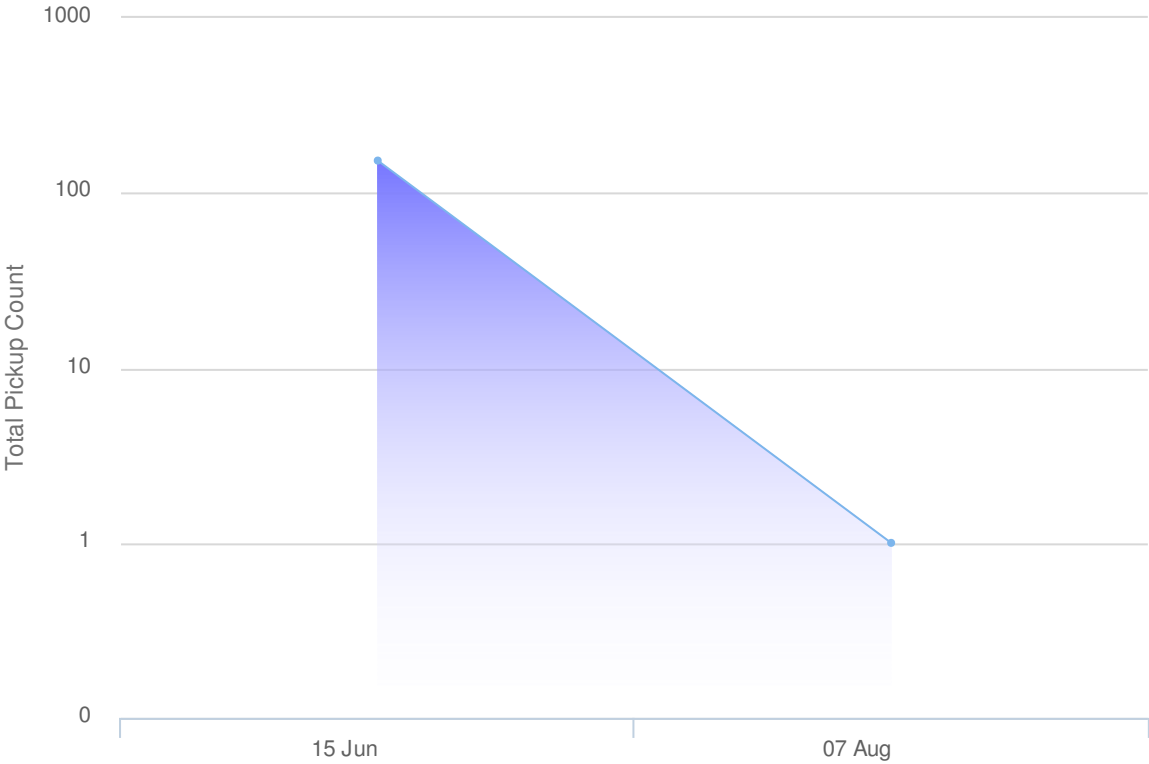
Pickup

Overview

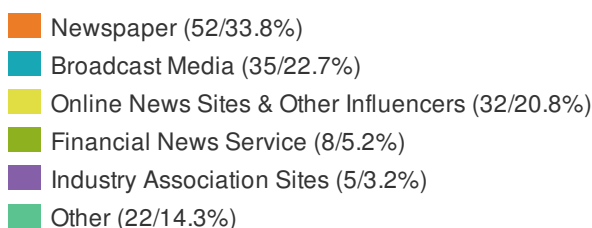
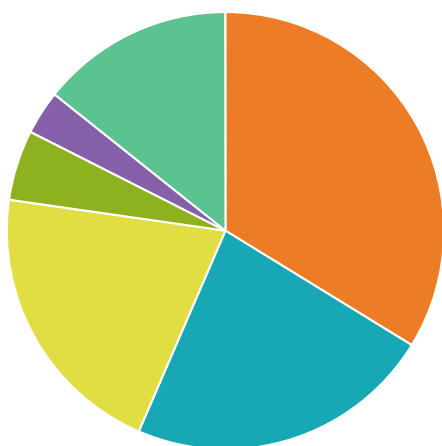
TOTAL PICKUP		154	TOTAL POTENTIAL AUDIENCE		113M
Exact Match		153 postings	Exact Match		113M visitors
Twitter		1 Tweet	Twitter		548 followers

Total Pickup Over Time

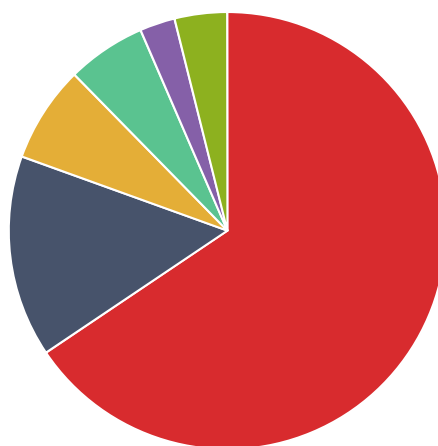
Total pickup since your content was distributed



Total Pickup by Source Type



Total Pickup by Industry








































Exact Match Pickup































Exact matches are full text postings of your content which we have found in the online and social media that we monitor. Understand how it is calculated.































Total Exact Matches: **153**







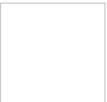



















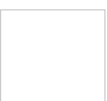

Total Potential Audience: **113,256,463.**































Logo	Outlet Name	Location	Source Type	Industry	Potential Audience
	Yahoo! Finance Online  View Release	Global	Online News Sites & Other Influencers	Media & Information	41,088,892 ^[1] visitors/month
	MarketWatch Online  View Release	United States	Financial News Service	Financial	33,910,226 ^[1] visitors/month
	The Globe and Mail Online  View Release	Canada	Newspaper	Media & Information	8,230,666 ^[1] visitors/month
	Seeking Alpha Online  View Release	United States	Financial News Service	Financial	7,288,866 ^[1] visitors/month































	PR Newswire Online  View Release	Global	PR Newswire	Media & Information	5,968,835 ^[1] visitors/month
	Benzinga Online  View Release	United States	Online News Sites & Other Influencers	Financial	3,441,304 ^[1] visitors/month
	Morningstar Online  View Release	Global	Financial Data, Research & Analytics	Financial	2,643,852 ^[1] visitors/month
	WFMY-TV IND-69 [Allentown, PA] Online  View Release	United States	Broadcast Media	Media & Information	1,318,396 ^[1] visitors/month
	Barchart.com Online  View Release	United States	News & Information Service	Financial	1,234,644 ^[1] visitors/month
	StreetInsider Online  View Release	United States	Online News Sites & Other Influencers	Financial	787,198 ^[1] visitors/month
	KAKE-TV ABC [Wichita, KS] Online  View Release	United States	Broadcast Media	Media & Information	657,060 ^[1] visitors/month
	WRCB-TV NBC-3 [Chattanooga, TN] Online  View Release	United States	Broadcast Media	Media & Information	621,393 ^[1] visitors/month
	Marietta Daily Journal [Marietta, GA] Online  View Release	United States	Newspaper	Media & Information	546,067 ^[1] visitors/month
	WFMJ-TV NBC-21 [Youngstown, OH] Online  View Release	United States	Broadcast Media	Media & Information	494,054 ^[1] visitors/month
	WBOC-TV CBS-16 [Salisbury, MD] Online  View Release	United States	Broadcast Media	Media & Information	401,946 ^[1] visitors/month
	WICU-TV NBC-12 / WSEE-TV CBS-35 [Erie, PA] Online  View Release	United States	Broadcast Media	Media & Information	339,495 ^[1] visitors/month
	KTVN-TV CBS-2 [Reno, NV] Online  View Release	United States	Broadcast Media	Media & Information	308,738 ^[1] visitors/month
	StockHouse.com Online  View Release	Canada	Trade Publications	Financial	281,697 ^[1] visitors/month
	Daily Local News Online  View Release	United States	Newspaper	Media & Information	179,082 ^[1] visitors/month































	Delaware County Daily Times Online  View Release	United States	Newspaper	Media & Information	173,907 ^[1] visitors/month
	WENY-TV [Horseheads, NY] Online  View Release	United States	Broadcast Media	Media & Information	172,906 ^[1] visitors/month
	St. Joseph News-Press Online  View Release	United States	Newspaper	Media & Information	154,273 ^[1] visitors/month
	RFD-TV [Nashville, TN] Online  View Release	United States	Broadcast Media	Media & Information	131,759 ^[1] visitors/month
	WRAL-TV CBS-5 [Raleigh, NC] Online  View Release	United States	Broadcast Media	Media & Information	128,972 ^[1] visitors/month
	Townhall Finance Online  View Release	United States	Financial News Service	Media & Information	128,972 ^[1] visitors/month
	Tamar Securities Online  View Release	United States	Online News Sites & Other Influencers	Financial	128,972 ^[1] visitors/month
	FinancialContent - PR Newswire Online  View Release	United States	Financial News Service	Media & Information	128,972 ^[1] visitors/month
	IBTimes Online  View Release	United States	Newspaper	Media & Information	128,972 ^[1] visitors/month
	Rockford Register Star [Rockford, IL] Online  View Release	United States	Newspaper	Media & Information	128,972 ^[1] visitors/month
	Great American Financial Resources Online  View Release	United States	News & Information Service	Financial	128,972 ^[1] visitors/month
	Franklin Credit Management Online  View Release	United States	Online News Sites & Other Influencers	Financial	128,972 ^[1] visitors/month
	Value Investing News Online  View Release	United States	Financial News Service	Financial	128,972 ^[1] visitors/month
	Dow Theory Letters Online  View Release	United States	Banking & Financial Institutions	Financial	128,972 ^[1] visitors/month
	Daily Penny Alerts Online  View Release	United States	Online News Sites & Other Influencers	Financial	128,972 ^[1] visitors/month































	Benefit Plans Administrative Services Online  View Release	United States	Online News Sites & Other Influencers	Financial	128,972 ^[1] visitors/month
	Ascensus Online  View Release	United States	Online News Sites & Other Influencers	Financial	128,972 ^[1] visitors/month
	1st Discount Brokerage Online  View Release	United States	Financial News Service	Financial	128,972 ^[1] visitors/month
	One News Page Global Edition Online  View Release	Global	Online News Sites & Other Influencers	Media & Information	109,187 ^[1] visitors/month
	WICZ-TV FOX-40 [Binghamton, NY] Online  View Release	United States	Broadcast Media	Media & Information	99,563 ^[1] visitors/month
	KJTV-TV FOX-34 [Lubbock, TX] Online  View Release	United States	Broadcast Media	Media & Information	58,789 ^[1] visitors/month
	VB Profiles Online  View Release	United States	News & Information Service	Business Services	55,001 ^[1] visitors/month
	Daily American [Somerset, PA] Online  View Release	United States	Newspaper	Media & Information	54,999 ^[1] visitors/month
	NCN: Northeast - News Channel Nebraska [Norfolk, NE] Online  View Release	United States	Broadcast Media	Media & Information	54,707 ^[1] visitors/month
	Spoke Online  View Release	United States	News & Information Service	Business Services	49,412 ^[1] visitors/month
	NCN: River Country - NewsChannelNebraska [Nebraska City, NE] Online  View Release	United States	Broadcast Media	Media & Information	47,074 ^[1] visitors/month
	The Courier Express [DuBois, PA] Online  View Release	United States	Newspaper	Media & Information	47,025 ^[1] visitors/month
	Suncoast News Network [Sarasota, FL] Online  View Release	United States	Broadcast Media	Media & Information	39,843 ^[1] visitors/month
	WRDE-TV CBS [Milton, DE] Online  View Release	United States	Broadcast Media	Media & Information	39,213 ^[1] visitors/month
	Bucks Local News Online  View Release	United States	Newspaper	Media & Information	38,322 ^[1] visitors/month































	Bradford Era Online  View Release	United States	Newspaper	Media & Information	32,148 ^[1] visitors/month
	Mainline Media News Online  View Release	United States	Newspaper	Media & Information	27,277 ^[1] visitors/month
	Reporter Online  View Release	United States	Newspaper	Media & Information	26,103 ^[1] visitors/month
	Montgomery Media Online  View Release	United States	Newspaper	Media & Information	25,863 ^[1] visitors/month
	The Progress News [Clearfield, PA] Online  View Release	United States	Newspaper	Media & Information	22,007 ^[1] visitors/month
	NCN: Panhandle - News Channel Nebraska [Grand Island, NE] Online  View Release	United States	Broadcast Media	Media & Information	19,417 ^[1] visitors/month
	Tioga Publishing Online  View Release	United States	Newspaper	Media & Information	19,212 ^[1] visitors/month
	Daily Herald [Chicago, IL] Online  View Release	United States	Newspaper	Media & Information	18,199 ^[1] visitors/month
	NCN: Southeast - News Channel Nebraska [Beatrice, NE] Online  View Release	United States	Broadcast Media	Media & Information	18,168 ^[1] visitors/month
	NCN: Platte Valley - News Channel Nebraska [Columbus, NE] Online  View Release	United States	Broadcast Media	Media & Information	16,801 ^[1] visitors/month
	Marketplace Online  View Release	United States	Broadcast Media	Media & Information	11,999 ^[1] visitors/month
	NCN: Metro - News Channel Nebraska [Omaha, NE] Online  View Release	United States	Broadcast Media	Media & Information	11,934 ^[1] visitors/month
	NewsBlaze US Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	8,219 ^[1] visitors/month
	Berks-Mont Online  View Release	United States	Newspaper	Media & Information	6,962 ^[1] visitors/month































	Delaware County News Network Online  View Release	United States	Newspaper	Media & Information	6,728 ^[1] visitors/month
	NCN: Central - News Channel Nebraska [Grand Island, NE] Online  View Release	United States	Broadcast Media	Media & Information	5,838 ^[1] visitors/month
	Millennium Magazine Online  View Release	United States	Magazine	Entertainment	5,443 ^[1] visitors/month
	One News Page Unites States Edition Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	4,126 ^[1] visitors/month
	The Daily Press [St. Marys, PA] Online  View Release	United States	Newspaper	Media & Information	4,002 ^[1] visitors/month
	Ask.com Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	3,650 ^[1] visitors/month
	KXTQ-FM 106.5 Magic [Lubbock, TX] Online  View Release	United States	Broadcast Media	Media & Information	3,615 ^[1] visitors/month
	KLZK-FM 107.7 YES FM [Lubbock, TX] Online  View Release	United States	Broadcast Media	Media & Information	3,301 ^[1] visitors/month
	CNHI News Online  View Release	United States	Newspaper	Media & Information	3,027 ^[1] visitors/month
	Telemundo Lubbock [Lubbock, TX] Online  View Release	United States	Broadcast Media	Media & Information	2,912 ^[1] visitors/month
	Magazines Today Online  View Release	Global	Trade Publications	Media & Information	2,829 ^[1] visitors/month
	ProfitQuotes Online  View Release	United States	Financial News Service	Financial	2,757 ^[1] visitors/month
	Ticker Technologies Online  View Release	United States	Financial News Service	Financial	2,665 ^[1] visitors/month
	Buffalo News [Buffalo, NY] Online  View Release	United States	Newspaper	Media & Information	2,624 ^[1] visitors/month
	WBOC-TV FOX-21 [Salisbury, MD] Online  View Release	United States	Broadcast Media	Media & Information	2,424 ^[1] visitors/month

	The SPIRIT Online  View Release	United States	Newspaper	Media & Information	2,406 ^[1] visitors/month
	Oklahoman [Oklahoma City, OK] Online  View Release	United States	Newspaper	Media & Information	2,343 ^[1] visitors/month
	Pittsburgh Post-Gazette [Pittsburgh, PA] Online  View Release	United States	Newspaper	Media & Information	2,326 ^[1] visitors/month
	Minyanville Online  View Release	United States	Online News Sites & Other Influencers	Financial	2,161 ^[1] visitors/month
	World Food Travel Association Online  View Release	Global	Industry Association Sites	Travel & Leisure	2,047 ^[1] visitors/month
	NCN: Mid-Plains - News Channel Nebraska [Grand Island, NE] Online  View Release	United States	Broadcast Media	Media & Information	2,040 ^[1] visitors/month
	The Chronicle Journal [Thunder Bay, ON] Online  View Release	Canada	Newspaper	Media & Information	1,992 ^[1] visitors/month
	100.7-FM The Score [Lubbock, TX] Online  View Release	United States	Broadcast Media	Media & Information	1,930 ^[1] visitors/month
	Latin Business Today Online  View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	1,698 ^[1] visitors/month
	KTTU-FM 97.3 Double T [Lubbock, TX] Online  View Release	United States	Broadcast Media	Media & Information	1,590 ^[1] visitors/month
	The Morning News [Blackfoot, ID] Online  View Release	United States	Newspaper	Media & Information	1,564 ^[1] visitors/month
	myMotherLode.com [Sonora, CA] Online  View Release	United States	Newspaper	Media & Information	1,556 ^[1] visitors/month
	Support for Stepdads Online  View Release	United States	Blog-Parental Influencers	Retail & Consumer	1,530 ^[1] visitors/month
	Jotup Online  View Release	Global	Online News Sites & Other Influencers	Business Services	1,450 ^[1] visitors/month
	ArlingtonWatches Online  View Release	Global	Online News Sites & Other Influencers	Retail & Consumer	1,384 ^[1] visitors/month

	KLBB-FM 93.7 The Eagle [Lubbock, TX] Online  View Release	United States	Broadcast Media	Media & Information	1,379 ^[1] visitors/month
	Borger News Herald [Borger, TX] Online  View Release	United States	Newspaper	Media & Information	1,288 ^[1] visitors/month
	KLCW-TV Lubbock CW [Lubbock, TX] Online  View Release	United States	Broadcast Media	Media & Information	1,234 ^[1] visitors/month
	Mammoth Times [Mammoth Lakes, CA] Online  View Release	United States	Newspaper	Media & Information	1,113 ^[1] visitors/month
	Malvern Daily Record [Malvern, AR] Online  View Release	United States	Newspaper	Media & Information	1,073 ^[1] visitors/month
	The Saline Courier [Benton, AR] Online  View Release	United States	Newspaper	Media & Information	1,073 ^[1] visitors/month
	Oldies 97.7 FM [Lubbock, TX] Online  View Release	United States	Broadcast Media	Media & Information	1,052 ^[1] visitors/month
	Daily Times Leader [West Point, MS] Online  View Release	United States	Newspaper	Media & Information	1,045 ^[1] visitors/month
	Fat Pitch Financials Online  View Release	United States	Online News Sites & Other Influencers	Financial	1,029 ^[1] visitors/month
	The Pilot News [Plymouth, IN] Online  View Release	United States	Newspaper	Media & Information	1,010 ^[1] visitors/month
	KMYL-TV MyLubbock-TV [Lubbock, TX] Online  View Release	United States	Broadcast Media	Media & Information	1,003 ^[1] visitors/month
	KJUN-TV / KFOL-TV HTV10 [Houma, LA] Online  View Release	United States	Broadcast Media	Media & Information	982 ^[1] visitors/month
	Sweetwater Reporter [Sweetwater, TX] Online  View Release	United States	Newspaper	Media & Information	936 ^[1] visitors/month
	Valley City Times-Record [Valley City, ND] Online  View Release	United States	Newspaper	Media & Information	881 ^[1] visitors/month
	Wapakoneta Daily News [Wapakoneta, OH] Online  View Release	United States	Newspaper	Media & Information	847 ^[1] visitors/month

	Decatur Daily Democrat [Decatur, IN] Online  View Release	United States	Newspaper	Media & Information	843 ^[1] visitors/month
	96.9-FM The Bull [Lubbock, TX] Online  View Release	United States	Broadcast Media	Media & Information	820 ^[1] visitors/month
	The Antlers American [Antlers, OK] Online  View Release	United States	Newspaper	Media & Information	806 ^[1] visitors/month
	Winslow, Evans & Crocker Online  View Release	United States	Online News Sites & Other Influencers	Financial	803 ^[1] visitors/month
	The Newport Daily Express [Newport, VT] Online  View Release	United States	Newspaper	Media & Information	756 ^[1] visitors/month
	Starkville Daily News [Starkville, MS] Online  View Release	United States	Newspaper	Media & Information	700 ^[1] visitors/month
	Big Spring Herald [Big Spring, TX] Online  View Release	United States	Newspaper	Media & Information	695 ^[1] visitors/month
	EDGE Philadelphia [Philadelphia, PA] Online  View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	694 ^[1] visitors/month
	The Punxsutawney Spirit [Punxsutawney, PA] Online  View Release	United States	Newspaper	Media & Information	690 ^[1] visitors/month
	Minster Community Post [Minster, OH] Online  View Release	United States	Newspaper	Media & Information	671 ^[1] visitors/month
	The Kane Republican [Kane, PA] Online  View Release	United States	Newspaper	Media & Information	665 ^[1] visitors/month
	The Observer News Enterprise [Newton, NC] Online  View Release	United States	Newspaper	Media & Information	656 ^[1] visitors/month
	CalTravel - California Travel Association Online  View Release	United States	Industry Association Sites	Travel & Leisure	648 ^[1] visitors/month
	Cori's Cozy Corner Online  View Release	United States	Blog-Parental Influencers	Retail & Consumer	637 ^[1] visitors/month
	The Forward Cabin Online  View Release	United States	Online News Sites & Other Influencers	Travel & Leisure	634 ^[1] visitors/month

	The Evening Leader [St. Marys, OH] Online  View Release	United States	Newspaper	Media & Information	622 ^[1] visitors/month
	The Post and Mail [Columbia City, IN] Online  View Release	United States	Newspaper	Media & Information	612 ^[1] visitors/month
	Ridgway Record [Ridgway, PA] Online  View Release	United States	Newspaper	Media & Information	584 ^[1] visitors/month
	Access News Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	580 ^[1] visitors/month
	Inyo Register [Bishop, CA] Online  View Release	United States	Newspaper	Media & Information	554 ^[1] visitors/month
	The Deer Park Tribune [Deer Park, WA] Online  View Release	United States	Newspaper	Media & Information	523 ^[1] visitors/month
	Poteau Daily News [Poteau, OK] Online  View Release	United States	Newspaper	Media & Information	522 ^[1] visitors/month
	DatelineCarolina Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	506 ^[1] visitors/month
	Skal International USA [SIUSA] Online  View Release	United States	Industry Association Sites	Travel & Leisure	430 ^[1] visitors/month
	Willard Post Online  View Release	Global	Blog	Multicultural & Demographic	420 ^[1] visitors/month
	SOGOTRADE Online  View Release	United States	News & Information Service	Financial	394 ^[1] visitors/month
	My Silly Little Gang Online  View Release	United States	Blog-Parental Influencers	Retail & Consumer	394 ^[1] visitors/month
	Forefront Media News Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	334 ^[1] visitors/month
	Maria Liberati Online  View Release	United States	Blog	Retail & Consumer	211 ^[1] visitors/month
	Travel Writers' Network Online  View Release	United States	Industry Association Sites	Travel & Leisure	211 ^[1] visitors/month

	Bay Area Business Travel Association Online  View Release	United States	Industry Association Sites	Travel & Leisure	145 ^[1] visitors/month
	Gaming and Leisure Online  View Release	United States	Trade Publications	Travel & Leisure	134 ^[1] visitors/month
	Investir USA Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	115 ^[1] visitors/month
	Ashley Yeen Online  View Release	Global	Blog	Retail & Consumer	87 ^[1] visitors/month
	Manhattanweek Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	64 ^[1] visitors/month
	Sightseers' Delight Online  View Release	United States	Blog	Travel & Leisure	52 ^[1] visitors/month
	Wine Country International Magazine Online  View Release	United States	Online News Sites & Other Influencers	Retail & Consumer	40 ^[1] visitors/month
	Saxus Leadership Development Online  View Release	United States	Online News Sites & Other Influencers	Business Services	Not Available
	Do You Vacation Online  View Release	United States	Online News Sites & Other Influencers	Travel & Leisure	Not Available
	Debt Collector News Online  View Release	United States	Online News Sites & Other Influencers	Financial	Not Available
	1stCounsel Online  View Release	United States	Online News Sites & Other Influencers	Policy & Public Interest	Not Available
	OTT Travel Online  View Release	United States	Online News Sites & Other Influencers	Travel & Leisure	Not Available
	Wine Diva Lifestyle Online  View Release	United States	Blog - Spirits, Cocktails, Beer & Wine	Retail & Consumer	Not Available
	Pronto Hotel Marketing Online  View Release	United States	Online News Sites & Other Influencers	Travel & Leisure	Not Available
	HustleLyn Online  View Release	United States	Blog-Parental Influencers	Retail & Consumer	Not Available

**The data cited here by SimilarWeb represents site traffic data of worldwide unique visitors on desktop and mobile devices. Data is updated monthly.*

Traffic

Overview

RELEASE VIEWS & HITS

5.4K

MULTIMEDIA

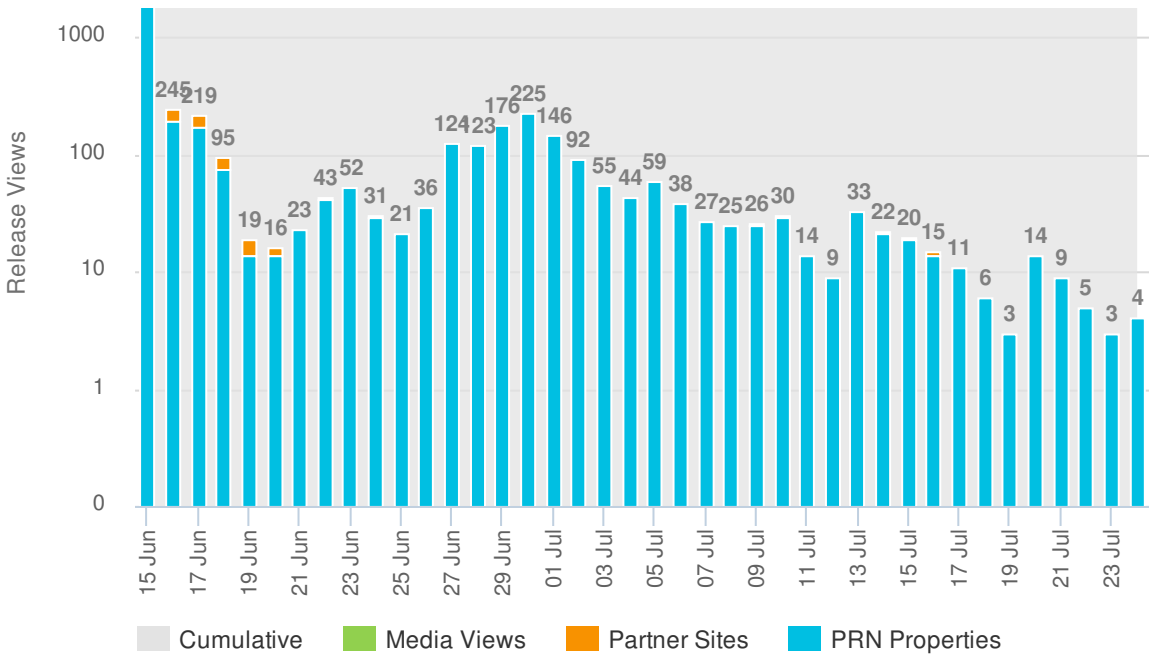
0

Release Views	4.8K
Media Views	60
Public Views	4.8K
Partner Sites	384
PR Newswire Channels	4.4K
Release Web Crawler Hits	543

Release Views

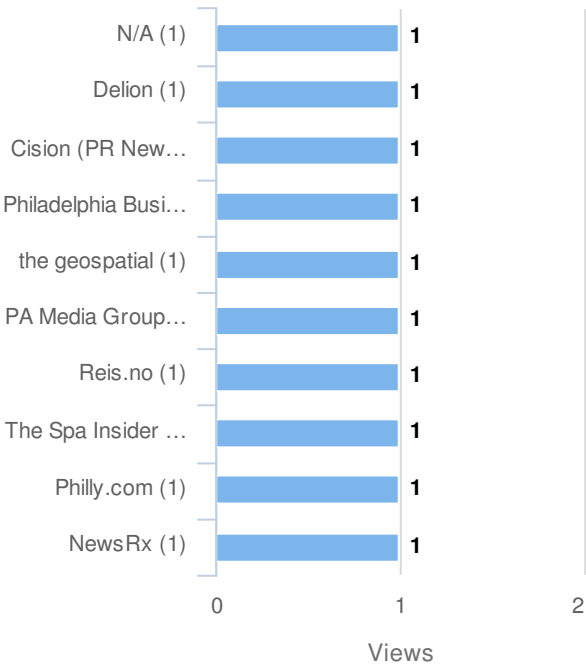
Release Views Over Time





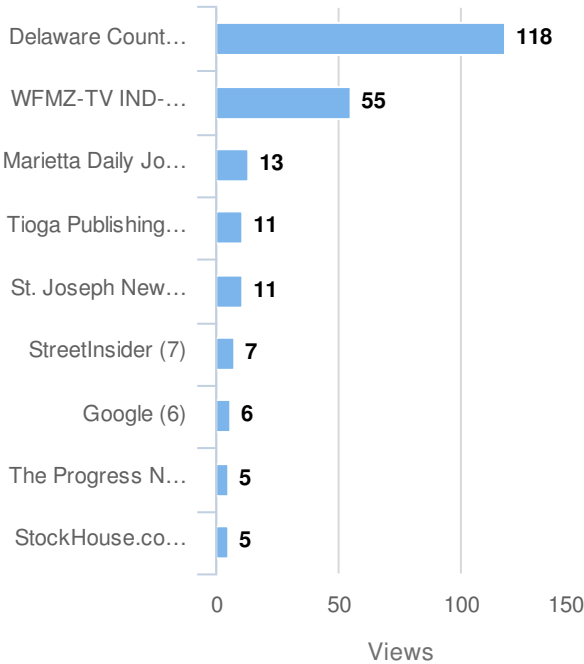
Media Views on PR Newswire for Journalists

Top 10 Outlets



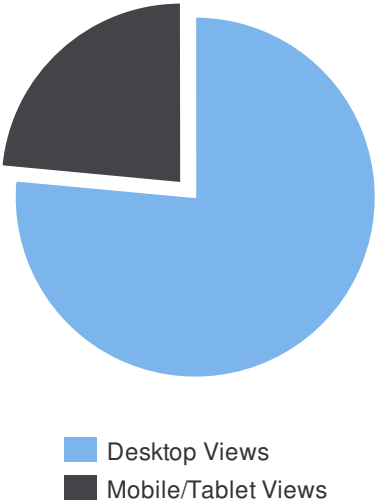
Views on Partner Sites

Top 10 Sites



Traffic to PR Newswire Properties

Type of Views



Views

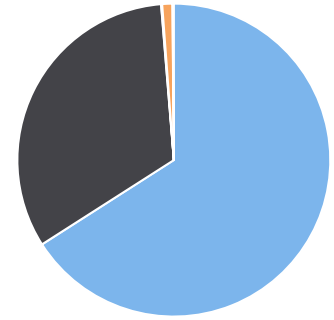
Type	Views
Desktop Views	3,363
Mobile/Tablet Views	1,034
Total Views on PR Newswire Properties	4,397

External Traffic Sources

Understand how viewers found your release.

Source Type	Source	Instances
Direct		2,900
Direct	Direct	2,900
Search Engine (3)		1,440
Total		4,397

Source Type	Source	Instances
Search Engine	Google	1,434
Search Engine	Ask.com	5
Search Engine	Bing	1
√ Social Media (1)		5
Social Media	Twitter	5
√ PR Newswire Properties (2)		46
PR Newswire Properties	pnewswire.com	43
PR Newswire Properties	newswire.ca	3
√ Other Sites (3)		6
Other Sites	search.myway.com	3
Other Sites	apps.liveqa.mcafeemobilesecurity.com	2
Other Sites	m.iexplore.io	1
Total		4,397



■ Direct
 ■ Search Engine
 ■ Social Media
 ■ PR Newswire Properties
 ■ Other Sites

Audience

Overview

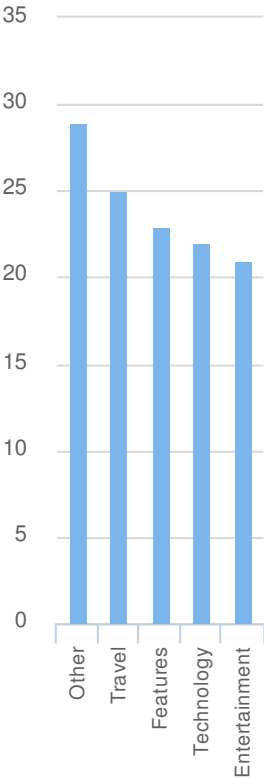
VIEWS FROM IDENTIFIED AUDIENCES 179		AP & INFLUENCER LIST RECIPIENTS 1K	
Media Views	60	Wire Distribution / AP Outlets 1K	
Organization Views	119		

Audience Summary

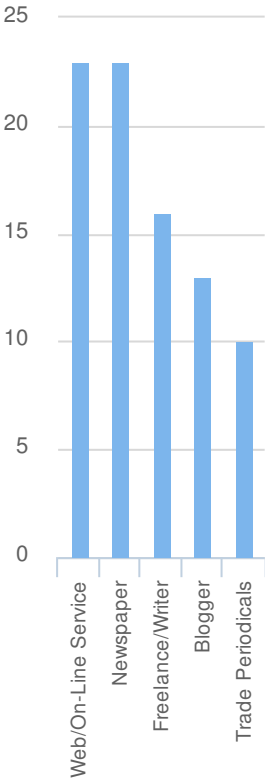
Media Demographics

A break down of the industries covered, the media types and the locations of the journalists & bloggers accessing your release on PR Newswire for Journalists.

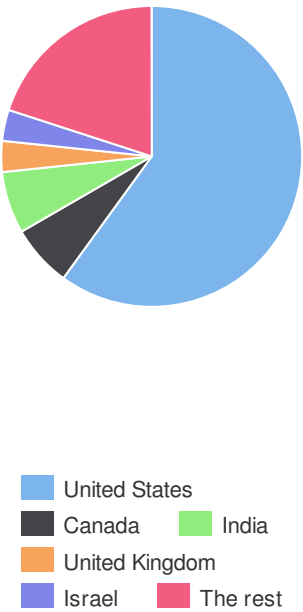
Top Industries



Top Media Types



Top Locations

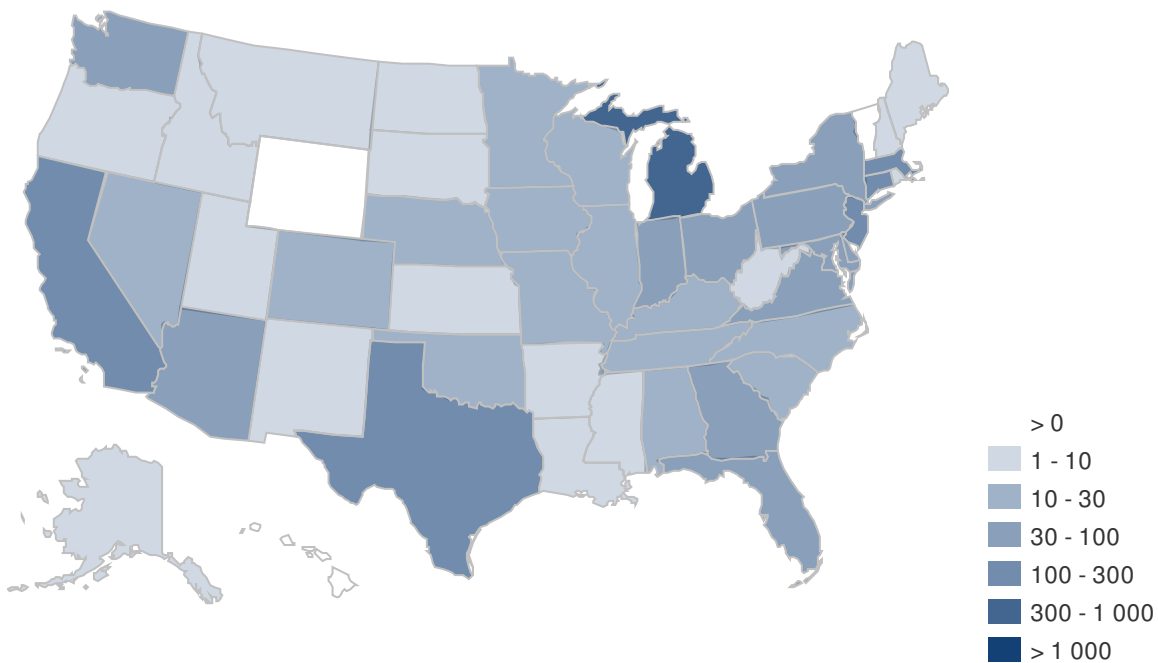
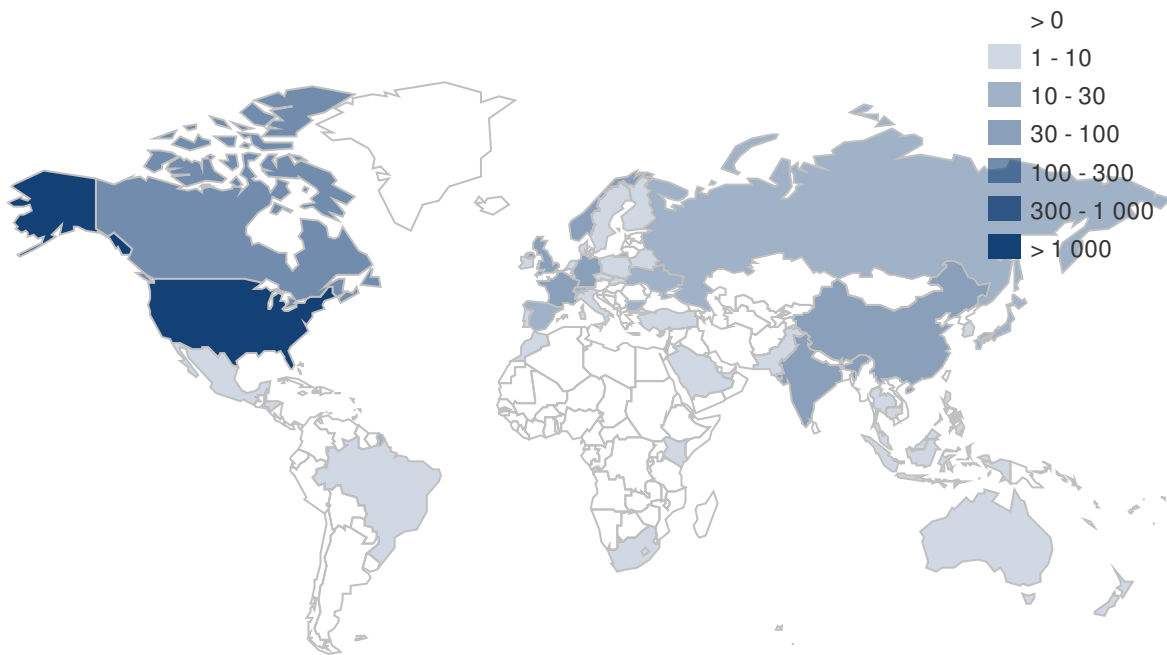


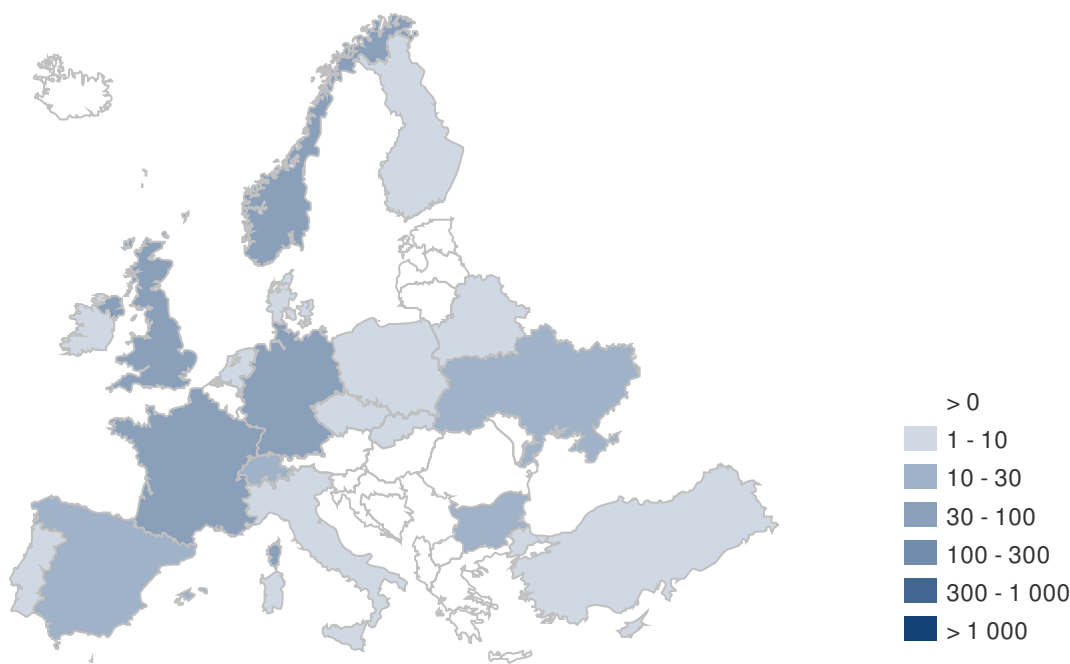
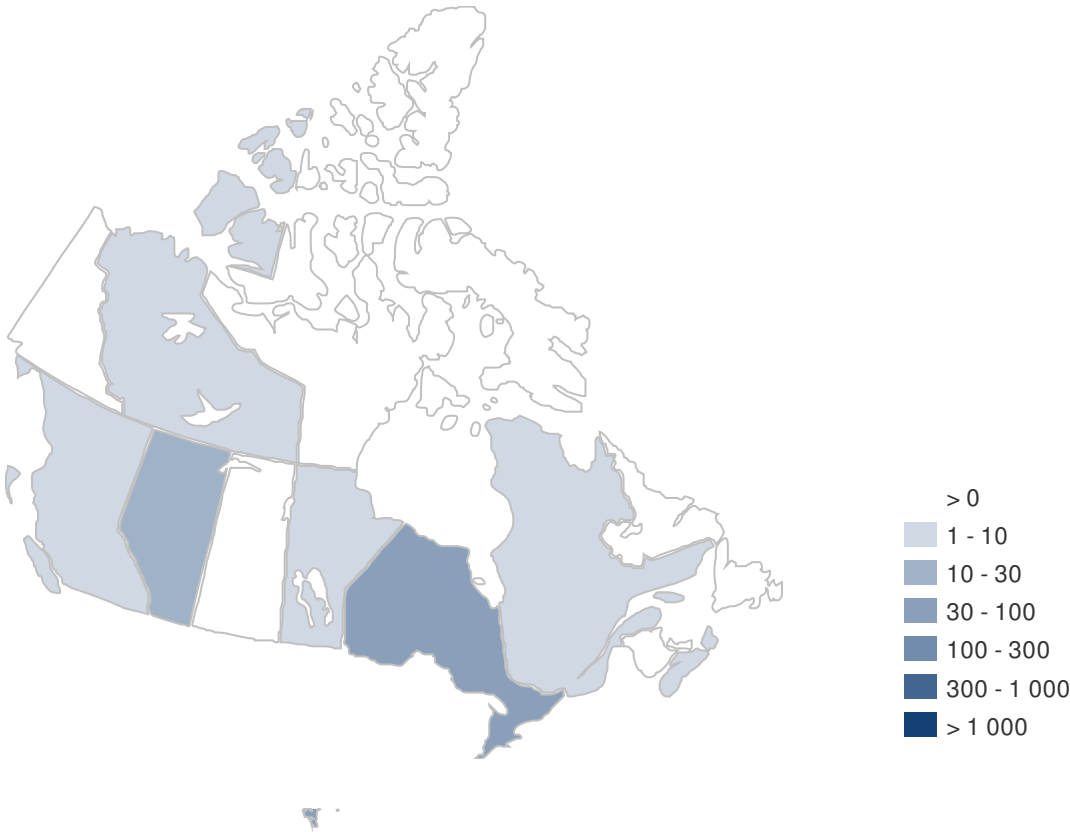
Geo-segmentation

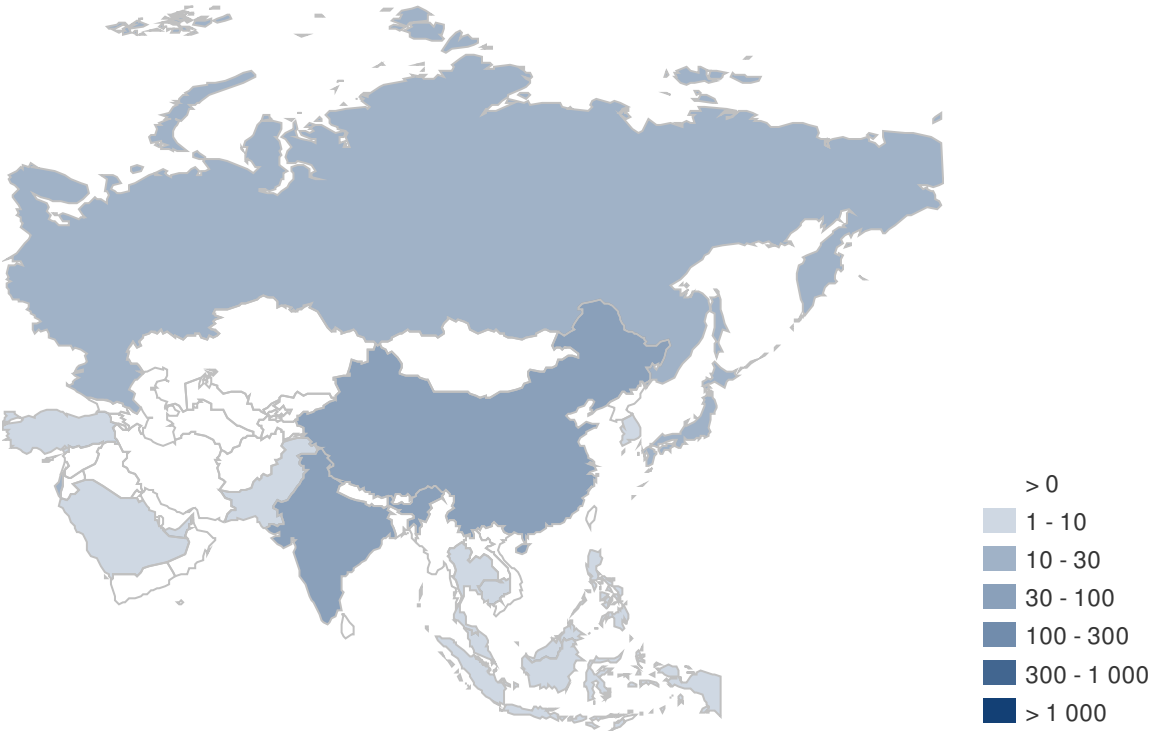
See where views of your release originated. Hover over map to see totals by location.

Select a region:

World View







Audience Details

Media Views

See the details of each media outlet from PR Newswire for Journalists that viewed your release.

Outlet	Industry	Source Type	Location	Views ▼
Total				60

N/A	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Newspaper, Web/On-Line Service	Israel ISRAEL	1
Delion	Environment, Financial Services, General Business, Other, Technology	Blogger, Newspaper	Canada CANADA	1
Cision (PR Newswire)	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Blogger, Consumer Periodicals, Freelance/Writer, Newspaper, Other, Radio, Television, Trade Periodicals, Web/On-Line Service, Wire Service	United States UNITED STATES	1
Philadelphia Business Journal	Consumer Products, Energy, Financial Services, General Business, Healthcare, Media, Other, Sports, Technology, Transportation, Travel	Newspaper	United States UNITED STATES	1
the geospatial	Media, Other, Technology	Web/On-Line Service	India INDIA	1
PA Media Group	General Business	Newspaper	United States UNITED STATES	1
Reis.no	Travel	Blogger, Consumer Periodicals	Norway NORWAY	1
The Spa Insider	Consumer Products, Travel	Freelance/Writer	United States UNITED STATES	1
Philly.com	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Blogger, Consumer Periodicals, Freelance/Writer, Newspaper, Other, Radio, Television, Trade Periodicals, Web/On-Line Service, Wire Service	United States UNITED STATES	1
NewsRx	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Web/On-Line Service	United States UNITED STATES	1
Word Geek Media	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Freelance/Writer	United States UNITED STATES	1
Argus Media Group	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Web/On-Line Service	United States UNITED STATES	1
Total				60

PR Newswire	Sports	Web/On-Line Service, Wire Service	United States UNITED STATES	1
The Morning Call	Public Issues	Newspaper	United States UNITED STATES	1
Law360 (Portfolio Media)	Energy	Web/On-Line Service	United States UNITED STATES	1
IVC	Auto, Energy, Entertainment, Environment, Financial Services, Healthcare, Media, Sports, Technology, Transportation, Travel	Other	Israel ISRAEL	1
National Observer	Other	Newspaper	United States UNITED STATES	1
N/A	Energy, Entertainment, Features, Media, Public Issues, Sports	Freelance/Writer	United States UNITED STATES	1
Pennsylvania Bar Institute	Other	Other	United States UNITED STATES	1
ULTIMATE REPORT	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Blogger, Freelance/Writer, Web/On-Line Service	United States UNITED STATES	1
gabby cabby	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other	Blogger, Consumer Periodicals, Freelance/Writer, Newspaper, Radio, Television, Trade Periodicals, Web/On-Line Service, Wire Service	United States UNITED STATES	1
Indian Branding Company	Entertainment, General Business, Public Issues, Technology	Freelance/Writer	India INDIA	1
S&P Global Intelligence	Energy, Heavy Industry, Other	Web/On-Line Service, Wire Service	United Kingdom UNITED KINGDOM	1
Indspark	Features	Blogger	Denmark DENMARK	1
KrazzyMag	Auto, Entertainment, Environment, Financial Services, General Business, Healthcare, Media, Public Issues, Sports, Technology, Travel	Blogger, Other, Web/On-Line Service	India INDIA	1
Freelance: FE News, The Orchard at Tesco	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Public Issues, Sports, Technology, Transportation, Travel	Consumer Periodicals, Freelance/Writer, Newspaper, Radio, Television, Trade Periodicals, Web/On-Line Service, Wire Service	United Kingdom UNITED KINGDOM	1
BlissFireMedia	Consumer Products, Entertainment, Environment, Features, Healthcare, Media, Other, Public Issues, Technology	Blogger, Consumer Periodicals, Freelance/Writer, Other, Web/On-Line Service	United States UNITED STATES	1
Total				60

Content Canada	Other	Freelance/Writer	Canada CANADA	1
Auburn Wire	Sports	Freelance/Writer, Web/On-Line Service	United States UNITED STATES	1
The Legal Intelligencer	General Business	Newspaper	United States UNITED STATES	1
Daily News	Other	Other	South Africa SOUTH AFRICA	1
PR	Technology	Other	Malaysia MALAYSIA	1
Freelancer	Other	Trade Periodicals	United States UNITED STATES	1
Silver Marketing Group	Auto, Broadcast, Consumer Products, Energy, Entertainment, Features, Financial Services, Healthcare, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Consumer Periodicals, Newspaper, Trade Periodicals, Web/On-Line Service	United States UNITED STATES	1
heart & soul	Entertainment, Healthcare, Travel	Consumer Periodicals, Radio, Web/On-Line Service	United States UNITED STATES	1
Economic Review	Auto, Energy, Features, Financial Services, Media, Public Issues, Sports	Freelance/Writer, Newspaper, Trade Periodicals	Pakistan PAKISTAN	1
SNL Energy	Energy	Trade Periodicals	United States UNITED STATES	1
http://gay_blog.blogspot.com/	Other, Travel	Web/On-Line Service	United States UNITED STATES	1
Feather River Bulletin	Other	Newspaper	United States UNITED STATES	1
Pittsburgh Business Times	Broadcast, Consumer Products, Energy, Entertainment, Features, Financial Services, Healthcare, Media, Public Issues, Sports, Technology, Transportation, Travel	Newspaper	United States UNITED STATES	1
WSAZ	Financial Services	Television	United States UNITED STATES	1
Freelancer	Features, Travel	Freelance/Writer	United States UNITED STATES	1
New York 1 News	Other	Television	United States UNITED STATES	1
Total				60

Walla Walla Union Bulletin	Features, Healthcare, Technology	Newspaper	United States UNITED STATES	1
Kingsport Times-New	Other	Newspaper	United States UNITED STATES	1
Randall-Reilly Publishing Co.	Transportation	Trade Periodicals	United States UNITED STATES	1
The Kyle & Jackie O Show	Broadcast, Consumer Products, Entertainment, Features, Media, Other, Public Issues, Technology	Radio	Australia AUSTRALIA	1
Gaceta UNAM	Environment, Features, Healthcare, Media, Public Issues, Sports, Travel	Newspaper, Web/On-Line Service	Mexico MEXICO	1
Sing Tao Daily Toronto Edition	Other	Newspaper	Canada CANADA	1
NRIT media	Auto, Consumer Products, Entertainment, Sports, Technology, Travel	Trade Periodicals, Web/On-Line Service	Netherlands NETHERLANDS	1
A Life In The day Of	Travel	Blogger	Canada CANADA	1
Enjoy Unlimited Holidays	Travel	Blogger	India INDIA	1
Khaleej Times	Features, Travel	Blogger, Newspaper, Radio, Web/On-Line Service	United Arab Emirates UNITED ARAB EMIRATES	1
Fitness And The Foodie	Consumer Products, Entertainment, Other, Travel	Blogger	United States UNITED STATES	1
Houston Chronicle	Features	Newspaper	United States UNITED STATES	1
Freelancer	Entertainment, Features, Healthcare	Freelance/Writer, Newspaper	United States UNITED STATES	1
News Aktuell	Other	Wire Service	Switzerland SWITZERLAND	1
Coelum	Other	Consumer Periodicals, Web/On-Line Service	Italy ITALY	1
Okinawa Marine	Broadcast, Environment, Features, Financial Services, Media, Public Issues, Technology, Transportation, Travel	Freelance/Writer, Newspaper, Web/On-Line Service, Wire Service	Japan JAPAN	1
WESA-FM	Other	Other	United States UNITED STATES	1
Total				60

Organization Views

See which organizations have viewed your release

Organization	Headquarters	Visitor Location	Parent Organization	Industry	Views
The Hongkong and Shanghai Banking Corp Ltd	2/F Technology Block, HSBC Building Tseung Kwan O, 2 Chun Sing Street, Tseung Kwan O Industrial Estate , Hong Kong	HONG KONG			7
ADAMS AND REESE LLP	701 Poydras ,	UNITED STATES			4
HSBC EDPI Pvt Ltd.	Plot # 8 Survey 64 (Part) Hi-Tech city Layout , India	INDIA			4
Baptist Health - MGM	P.O. Box 11010 , United States	UNITED STATES	Baptist Medical Center	Healthcare, Pharmaceuticals, & Biotech	4
Headquarters, USAISC	NETC-ANC CONUS TNOSC , United States	UNITED STATES	Army Network Enterprise Technology Command (NETCOM)	Government	3
HSBC Bank plc	Wentworth Industrial Park Maple Road Tankersly Barnsley S75 3DJ UK , United Kingdom	UNITED KINGDOM	HSBC Holdings plc	Financial Services	3
O'Play Digital Services Limited	Plot 8, Dr. Nurudeen Olowopopo Avenue, Alausa, Ikeja, Lagos, Nigeria Lagos , Nigeria				2
Halliburton Company	3000 N Sam Houston Pkwy E , United States	UNITED STATES	Halliburton Company	Energy & Utilities	2
Symantec Corporation	350 Ellis Street , United States	UNITED STATES	Symantec Corporation	Software & Internet	2
Trinity Information Services	20555 Victor Parkway , United States	UNITED STATES	Trinity Health	Healthcare, Pharmaceuticals, & Biotech	2
AB DATA LTD	5301 N IRONWOOD RD , United States	UNITED STATES	AB Data Ltd	Business Services	2
St. Joseph's College	P.O. Box 909 , United States	UNITED STATES		Education	2
McAfee, Inc.	2821 Mission College Blvd. , United States	UNITED STATES	McAfee, Inc.	Manufacturing	2
Department of Veterans Affairs	810 Vermont Ave., NW , United States	UNITED STATES	Department of Veterans Affairs	Government	2
OPTAGE Inc.	Japan	JAPAN			2
North Central PA. Region	651 Montmorenci Ave , United States	UNITED STATES	North Central Pennsylvania Regional Planning and Development Commission	Government	2
Thomson Reuters U.S. LLC	One Station Place Metro Center , United States	UNITED KINGDOM	Thomson Reuters Corporation	Media & Entertainment	1
Thomson Reuters (Professional) Australia Limited	19 Harris Street, Level 6 , Australia	AUSTRALIA	Thomson Reuters (Professional) Australia Limited	Media & Entertainment	1
VOLOCOM SRL	Via Luigi Rizzo, 8/1 , Italy	ITALY			1
SID-18051 CI -Administrative Office of the United States Courts	21571 Beaumeade Circle , United States	UNITED STATES		Government	1
DOWNING WELLHEAD EQUIPMENT	2106 N F M 1788 , United States	UNITED STATES	Downing Wellhead Equipment Inc	Energy & Utilities	1
U.S. Dept. of Health and Human Services	HHS/ASA/OCIO Room 360-G , United States	UNITED STATES	HHS	Government	1
Information Handling Services	15 Inverness Way East. , United States	UNITED STATES	IHS Inc	Software & Internet	1
Total					119

HCITC	406 Caroline , United States	UNITED STATES		Government	1
23andme	2035 Landings Drive , United States	UNITED STATES	23andMe , Inc.	Healthcare, Pharmaceuticals, & Biotech	1
Cisco Systems, Inc.	170 West Tasman Drive , United States	UNITED STATES	Cisco Systems Inc	Manufacturing	1
COWEN EXECUTION SERVICES LLC.	599 Lexington Ave 20th Floor , United States	UNITED STATES			1
STAYBRIDGE LEXINGTON - Telegration, Inc	125 Louie Pl , United States	UNITED STATES			1
Aviva Canada Inc	2206 Eglinton Av E , Canada	CANADA	Aviva Canada Inc.	Insurance	1
JOHNS MARRS ELLIS & HODGE LLP	805 W 10TH ST #400 , United States	UNITED STATES			1
TOYOTA MOTOR SALES	1001 CHERRY BLOSSOM WAY , United States	UNITED STATES			1
Baker & Hostetler LLP	127 Public Square ,	UNITED STATES			1
Alorica Philippines Inc.	5/F Alphaland Southgate Tower 2258 Chino Roces Ave. cor. EDSA , Philippines	PHILIPPINES			1
State Farm Mutual Automobile Insurance Company	3 State Farm Plaza South , United States	UNITED STATES	State Farm Mutual Automobile Insurance Company	Insurance	1
Lockheed Martin Corporation	1401 Del Norte , United States	UNITED STATES	Lockheed Martin Corporation	Manufacturing	1
Team Industrial Services, Inc.	13131 Dairy Ashford Road Suite 600 , United States	UNITED STATES	TEAM Industrial Services , Inc.	Real Estate & Construction	1
California State University, Chico	Communications Services California State University, Chico , United States	UNITED STATES	California State University , Chico	Education	1
VISA INTERNATIONAL SERVICE ASSOCIATION	P.O. Box 8999 , United States	UNITED STATES			1
Burlington Northern	Suite 600, 777 Main Street , United States	UNITED STATES	BNSF Railway Company	Transportation & Storage	1
Agri-Valley Services Corporation	38 South Main Street Box 650 , United States	UNITED STATES			1
Bechtel Corporation	12011 Sunset Hills Road , United States	UNITED STATES	Bechtel Corporation	Real Estate & Construction	1
Oracle Corporation	500 Oracle Parkway Attn: Charles Hoynowski , United States	UNITED STATES	Oracle Corporation	Software & Internet	1
Co-operative Group Limited	Co-operative Group 1 Angel Square , United Kingdom	UNITED KINGDOM			1
CAROLINAS HEALTHCARE SYSTEM	801 S MCDOWELL ST , United States	UNITED STATES	Carolinas HealthCare System	Healthcare, Pharmaceuticals, & Biotech	1
Knolls Atomic Power Lab	PO Box 1072 , United States	UNITED STATES	Knolls Atomic Power Laboratory	Software & Internet	1
VPN-Consumer-US	800 Secaucus Rd Secaucus , United States				1
EXCO EXTRUSION DIE	56617 N BAY DR , United States	UNITED STATES			1
FTS DEPT OF ENERGY90DOEX	814 PITTSBURGH MCKEESPORT BLVD , United States	UNITED STATES			1
Total					119

University of Wisconsin Madison	1210 W Dayton B332 , United States	UNITED STATES	University of Wisconsin - Whitewater	Education	1
Roof Technical Services	1944 Handley Dr , United States	UNITED STATES	Roof Technical Services Inc	Real Estate & Construction	1
DYNAMIC AIR INC.	1125 WILLOW LAKE BLVD , United States	UNITED STATES	Dynamic Air Inc		1
State of WI Dept. of Administration	101 East Wilson Street 8th Floor , United States	UNITED STATES			1
Deutsche Bank	2 Gatehall Drive , United States	HONG KONG	Deutsche Bank AG	Financial Services	1
The Goodyear Tire & Rubber Company	200 Innovation Way , United States	UNITED STATES			1
FN-MX	Mexico	NETHERLANDS			1
Mother Frances Hospital Regional Health Care Center	509 Douglas Blvd , United States	UNITED STATES	Trinity Mother Frances Hospitals & Clinics	Healthcare, Pharmaceuticals, & Biotech	1
TELASTIC	4210 Coronado Avenue , United States	UNITED STATES			1
Mobilcomm, Inc	1211 West Sharon Road , United States	UNITED STATES	Mobilcomm Inc	Telecommunications	1
USDA Office of Operations	Suite 133, Building A SW , United States	UNITED STATES	U.S. Department of Agriculture	Government	1
Wells Fargo & Company	420 Montgomery ST , United States	UNITED STATES	Wells Fargo & Company	Financial Services	1
Merck and Co., Inc.	126 East Lincoln Avenue , United States	UNITED STATES	Merck & Co. , Inc.	Healthcare, Pharmaceuticals, & Biotech	1
FTS 2001/Dept of Labor OAS	200 constitution Ave NW Suite N. 1301 , United States	UNITED STATES	Organization of American States	Non-Profit	1
North Central Pennsylvania Regional Planning and Development Commission	651 Montmorenci Road , United States	UNITED STATES	North Central Pennsylvania Regional Planning and Development Commission	Government	1
The Boeing Company	The Boeing Company , United States	UNITED STATES	The Boeing Company	Manufacturing	1
SkyPort at Texas Army National Guard	2200 W 35th St Bldg #18 , United States	UNITED STATES			1
CLARKSVILLE DEPARTMENT OF ELECTRICITY	2021 Wilma Rudolph Blvd. , United States	UNITED STATES	Clarksville Department of Electricity	Energy & Utilities	1
G-Core Labs S.A.	2A Rue Albert Borschette LUXEMBOURG , Germany	LUXEMBOURG			1
William Beaumont Hospital	3601 West 13 Mile Road , United States	UNITED STATES	William Beaumont Hospital	Healthcare, Pharmaceuticals, & Biotech	1
CORP BROTHER INTERNATIONAL	United States	UNITED STATES			1
Lam Research Corporation	4650 Cushing Parkway , United States	UNITED STATES	Lam Research Corporation	Manufacturing	1
New York State	Office For Technology , United States	UNITED STATES	New York State Education Department	Government	1
Federal Trade Commission	600 Pennsylvania Ave. NW , United States	UNITED STATES	Federal Trade Commission	Government	1
College of the Holy Cross	474 Main Street ,	UNITED STATES			1
Total					119

SUBWAY	2600 N SQUIRREL RD , United States	UNITED STATES	Subway		1
Guthrie Health Care Services	1 Guthrie Sq. , United States	UNITED STATES			1
Indiana Office of Technology	Indiana Government Center North 100 North Senate Avenue, Room N551 , United States	UNITED STATES			1
U.S. Geological Survey	12201 Sunrise Valley Drive , United States	UNITED STATES	U.S. Geological Survey	Government	1
ZFUS SERVICES, LLC	6303 OWENSMOUTH AV , United States	UNITED STATES			1
CAMGSM Company Ltd	33 Preah Sihanouk Blvd P.O. Box 2468 , Cambodia	CAMBODIA			1
BJC HEALTH SYSTEM	4353 CLAYTON AV , United States	UNITED STATES	BJC HealthCare	Healthcare, Pharmaceuticals, & Biotech	1
USA TODAY	7950 Jones Branch Drive , United States	UNITED STATES	Gannett Co. , Inc.	Media & Entertainment	1
Circle Computer Resources, Inc.	845 Capital Drive SW , United States	UNITED STATES	Circle Computer Resources Inc		1
Cleary, Gottlieb, Steen & Hamilton LLP	Wezembeekstraat 2 ,	BELGIUM			1
Turner Broadcasting System, Inc.	One CNN Center 13N , United States	UNITED STATES	Turner Broadcasting System , Inc.	Media & Entertainment	1
TCI LEASING-101129114824	Hosting Center Address ,	UNITED STATES			1
HCR Manorcare	333 North Summit st. , United States	UNITED STATES	HCR ManorCare	Healthcare, Pharmaceuticals, & Biotech	1
SIRKit Ltd	201 , 6766 75 St , Canada	CANADA	SIRKit Ltd	Software & Internet	1
BankOnIT, L.L.C.	8601 Commerce Park Drive , United States	UNITED STATES	BankOnIT LLC	Financial Services	1
Refinitiv US LLC	REFINITIV, 3 TIMES SQUARE , United States	UNITED STATES	REFINITIV US LLC		1
CNSP	1308 APACHE AVE , United States	UNITED STATES	CNSP Inc	Telecommunications	1
Total					119

Associated Press Outlets

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Outlet Name	City	State	Newsline	Type	Audience
C-SPAN	Washington	DC	US1	Television	86,200,000 Subscribers
Scribd, Inc.	San Francisco	CA	US1	Aggregator	43,531,670 Visitors per Month
FoxNews.com	New York	NY	US1	Online	32,516,438 Visitors per Month
CBS News Radio	New York	NY	US1	Radio	30,000,000 Broadcast Audience
New York Times Digital	New York	NY	US1	Newspaper	29,886,442 Visitors per Month

Outlet Name	City	State	Newsline	Type	Audience
Apple Inc.	Cupertino	CA	US1	Organization/Company	29,709,459 Visitors per month
CNBC.com	Englewood Cliffs	NJ	US1	Online	26,089,260 Visitors per Month
CBSnews.com	New York	NY	US1	Online	26,080,671 Visitors per Month
abcnews.com	New York	NY	US1	Online	24,167,779 Visitors per Month
U.S. News & World Report	Washington	DC	US1	Magazine	23,945,529 Visitors per Month

Engagement

Overview

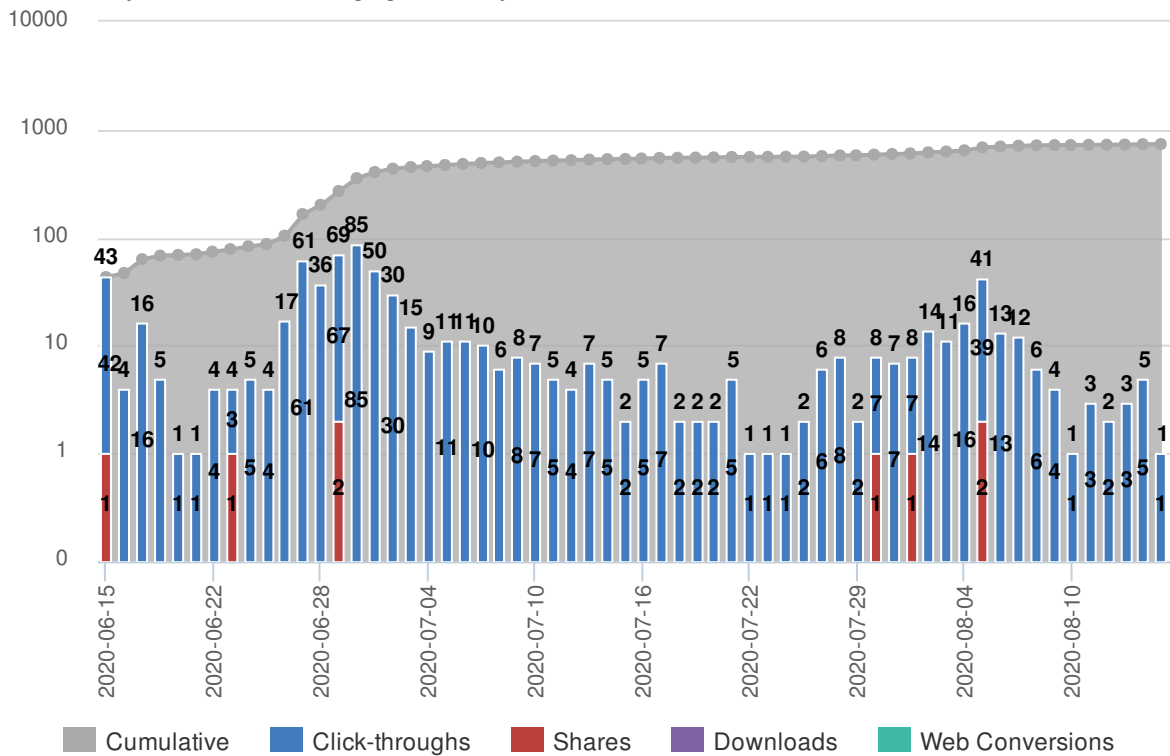
TOTAL ENGAGEMENT ACTIONS 744

Click-throughs 736

Shares 8

Engagement Timeline

See when your audience engaged with your release.



Engagement Details

A break down of click-throughs, shares and other engagement actions.

Click-throughs

The number of times your release sent visitors to the pages you linked to

URL	Click-throughs
http://www.IHGdatasecuritysettlement.com	734
Total	736

URL	Click-throughs
http://www.ihgdatasecuritysettlement.com/	1
https://gdpr.cision.com/	1
Total	736

Shares

A breakdown of the types of sharing your release generated.

Type of share	Shares
Print	5
Email	3
Total Shares	8

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Exhibit G

IN RE: Orr, et al. v. InterContinental Hotels Group, PLC, et al.
No. 17-cv-01622-MLB (N.D. Ga.)
REQUESTS FOR EXCLUSION
RECEIVED THROUGH AUGUST 19, 2020

1. David Kothman
2. David Adour
3. Guenter Pesch
4. Steve Braskie
5. Mark Brotman
6. Jonathan Northrup
7. Michelle Yarber
8. Joseph Ebel
9. Barbara Theofilis
10. Peter Tavares
11. Robert Davis
12. John Williamson Jr.
13. Frederick Stiles
14. David Sapp
15. Robert Callaway
16. Dennis Balling
17. Robert Cline
18. Daniel Kunz
19. Daniel Davis
20. Jeri Garreau
21. Richard Epstein
22. Valeriya Ignatova
23. Ryan Zierman
24. Richard Young
25. Thomas Radice
26. Jarret Lafleur
27. Joachim Schaefer