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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SHELA CAMENISCH, et al.

Plaintiffs,

v.

UMPQUA BANK,

Defendant.

Case No. 5:20-cv-5905-PCP

**DECLARATION OF MORGAN
KIMBALL REGARDING ACCOUNT
INTEREST AND *CY PRES*
DISTRIBUTION**

1 I, Morgan Kimball, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the
2 following is true:

3 1. I am a Senior Project Manager for Epiq Class Action and Claims Solutions, Inc.
4 (“Epiq”). The statements of fact in this declaration are based on my personal knowledge and
5 information provided to me by my colleagues in the ordinary course of business and, if called on to do
6 so, I could and would testify competently thereto.

7 2. Epiq was appointed as the Settlement Administrator in the above-captioned action
8 pursuant to the Court’s Order Granting Preliminary Approval of Class Settlement, dated May 22, 2025
9 (the “Preliminary Approval Order”).¹ I submit this Declaration in order to provide the Parties and the
10 Court with information regarding the account interest and *cy pres* distribution.

11 **ACCOUNT INTEREST**

12 3. Pursuant to paragraph 3.5 of the Settlement Agreement, Epiq was to open an
13 Administration Account for purposes of distributing the Settlement Amount towards payment of
14 attorneys’ fees and expenses, Service Awards, administration costs, and Class Members’ Distributions.

15 4. On September 17, 2025, in advance of Defendants funding the Settlement Amount, Epiq
16 coordinated with Citizens Bank to open the Administration Account as a “qualified settlement fund.” In
17 managing the Administration Account, Epiq took steps to ensure that the account would be non-interest
18 bearing, such that all funds would be distributed in one distribution. Due to an internal operational error
19 with Citizens Bank, interest was not turned off on the account, and interest accrued monthly between
20 October 2025 and June 2026, inclusive. Although Citizens Bank previously advised Epiq that interest
21 had been off for the Administration Account, the error prevented that from being properly implemented.
22 Consequently, interest accrued.

23 5. In performing a review of the Administration Account in June 2026, Epiq identified that
24 the account was earning interest and worked promptly with Citizens Bank to resolve. No further
25 interest has been earned in the Administration Account since June 2026, and Citizens Bank has ensured
26 that no further interest will accrue in the Administration Account.

27
28 ¹ All capitalized terms not otherwise defined in this document shall have the same meanings ascribed to them in the Settlement Agreement.

6. In June 2026, Epiq analyzed the interest earned and made a tax payment to the Internal Revenue Service (“IRS”) of \$881.00 on behalf of interest earned in 2026. This tax payment was paid out of the Administration Account. In 2027, Epiq will file a tax return with the IRS on behalf of the 2026 tax year, through which Epiq expects the Administration Account to receive a refund of the full amount of \$881.00. At that time, all interest earned will be available in the Administration Amount for distribution.

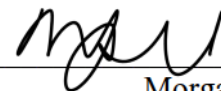
CY PRES DISTRIBUTION

7. The total interest earned in the Administration Account is \$21,947.61 (“Account Interest”). Distribution of the Account Interest to Class Members would result in the mailing of approximately 2,700 additional checks, of which more than half would be for less than \$5.00 and approximately 300 would be for less than \$1.00. The costs associated with further processing and mailing of such checks would exceed the amount of Account Interest. Therefore, Epiq and Class Counsel have determined that it is not feasible and economically rational to perform a distribution of the Account Interest to Class Members. As such, Epiq and Class Counsel respectfully request the Court approve a *cy pres* donation of the Account Interest to be made to Operation Hope.

SETTLEMENT WEBSITE

8. As described in the Declaration of Morgan Kimball Regarding Completion of Notice Program, Epiq maintains and monitors the Settlement Website dedicated to the Settlement. On September 2, 2026, Epiq posted to the Settlement Website a copy of the Post-Distribution Accounting Report, dated September 1, 2026. Epiq will continue to maintain and update the Settlement Website throughout the settlement administration process.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on October 2, 2026, in Seattle, WA.



Morgan Kimball