

Kim D. Stephens  
kstephens@tousley.com  
Christopher I. Brain  
cbrain@tousley.com  
Jason T. Dennett  
jdennett@tousley.com  
Tousley Brain Stephens PLLC  
1700 Seventh Avenue, Suite 2200  
Seattle, WA 98101  
Tel: (206) 682-5600  
Fax: (206) 682-2992

*Plaintiffs' Settlement Class Counsel*

Keith S. Dubanevich  
kdubanevich@stollberne.com  
Yoona Park  
ypark@stollberne.com  
Stoll Stoll Berne Lokting  
& Shlachter P.C.  
209 SW Oak Street, Suite 500  
Portland, OR 97204  
Tel: (503) 227-1600  
Fax: (503) 227-6840

*Plaintiffs' Settlement Class Counsel*

**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF OREGON**

IN RE: PREMIERA BLUE CROSS  
CUSTOMER DATA SECURITY BREACH  
LITIGATION

Case No. 3:15-md-2633-SI

**DECLARATION OF KEITH S.  
DUBANEVICH IN SUPPORT OF  
PLAINTIFFS' MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

I, Keith S. Dubanevich, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a shareholder in the law firm of Stoll Berne in Portland, Oregon and am one of the attorneys personally involved in the litigation of this matter. I submit this declaration in support of Plaintiffs' Motion for Final Approval of Class Action Settlement.

2. As I previously stated in my Declaration in Support of Plaintiff's Motion for Class Certification, dated August 3, 2018 (Dkt.157), I am an experienced class action litigator and was appointed liaison counsel by the Court.

3. Based my over thirty years of experience and my involvement in this case, which included reviewing hundreds if not thousands of pages of documents, conducting multiple depositions, numerous court appearances, extensive involvement in the briefing of all legal issues, as well as my participation in mediation and settlement negotiations, I recommend the Settlement in this Action as fair, reasonable, and adequate. The Settlement was reached only after extensive discovery, extended negotiations and in-depth discussions among the members of the Plaintiffs' Steering Committee (PSC), and all members of the PSC recommend approval of the Settlement.

4. Neither I nor any member of the PSC have received any inquiries from any federal or state official in response to the CAFA notice disseminated by the Settlement Administrator in this Action.

5. The substance of any objection(s) to the Settlement in this Action will be addressed in the Reply in Support of Plaintiffs' Motion for Final Approval, to be filed on February 19, 2020.

6. Because the claim filing deadline in this Action is March 30, 2020, and new claims continue to be received and processed, it is difficult to estimate at this time how much monetary

compensation each Class Member who submits a Claim Form will receive. Plaintiffs will include this estimate in the Reply to be filed in support of the Motion for Final Approval on February 19, 2020.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 10th day of January, 2020.



---

Keith S. Dubanevich