David A. Schuck, OSB 993564 E-Mail: dschuck@wageclaim.org Stephanie J. Brown, OSB 030019 E-Mail: sbrown@wageclaim.org Karen A. Moore, OSB 040922 E-Mail: kmoore@wageclaim.org

SCHUCK LAW, LLC Attorneys at Law 208 E 25<sup>th</sup> Street • Vancouver, WA 98663 Tel (360) 566-9243 Attorney for Plaintiff and Class

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON

**CANAN SCHUMANN**, individually and on behalf of all similarly situated,

v.

AMAZON.COM SERVICES LLC; AMAZON.COM, INC., a foreign corporation,

Defendant.

Plaintiff.

Case No. 20-cv-01751-JR

DECLARATION OF KAREN A. MOORE SUPPORTING ADDENDUM TO STIPULATION OF SETTLEMENT AGREEMENT OF CLASS ACTION CLAIMS

I, Karen A. Moore, hereby declare:

1. I am one of the attorneys for Plaintiff and Class Members herein. I make this

declaration upon personal knowledge and in support of the Addendum to Stipulation of

Settlement of Class Action Claims and amounts requested to be awarded therein.

2. As explained in my declaration supporting the Settlement Agreement, I have

overseen the ORCP 32 / FRCP 23 Notice administration in over 20 class actions. I have been

**SCHUCK LAW, LLC** 208 E 25<sup>th</sup> Street • Vancouver, WA 98663 Tel (360) 566-9243

Page 1 - Declaration of Karen A. Moore Supporting Addendum to Stipulation of Settlement of Class Action Claims

## Case 3:20-cv-01751-JR Document 49 Filed 07/31/23 Page 2 of 2

responsible for handling the administration directly in approximately 12 class actions. In those cases that required a claim form from the class member, the claim submission rate is rarely over 50%. In one class action, that contained approximately 50 class members total, the claim rate was greater than 90%. However, that high of a claim rate is extraordinarily rare.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 31, 2023.

Schuck Law, LLC

/s/ Karen A. Moore KAREN A. MOORE, Esquire OSB # 040922, WSB # 42476 (360) 566-9243 Attorney for Plaintiff and Class Members

Page 2 - Declaration of Karen A. Moore Supporting Addendum to Stipulation of Settlement of Class Action Claims

**SCHUCK LAW, LLC** 208 E 25<sup>th</sup> Street • Vancouver, WA 98663 Tel (360) 566-9243