

DISTRICT COURT, ARAPAHOE COUNTY, COLORADO Court Address: 7325 South Potomac St. Centennial, CO 80112		
Plaintiffs: Paula Henderson, Shykira Scott, Daniel Jones, Carol Goldberg, Vahram Haroutunian, Brian Kearney, Hilda Lopez, Preference Robinson, Sharon Etchieson, Radhe Banks, Jonathan Trusty, Marie Netrosio, Michaela Mujica-Steiner, Roger Loeb, Kyle Denlinger, Martin Coleman, Alyssa Halaseh, Rachel Hunter, Todd Valentine and David Moynahan, <i>on behalf of themselves and all others similarly situated</i> , v. Defendants: Reventics, LLC, OMH Healthedge Holdings, Inc., d/b/a Omega Healthcare		▲ COURT USE ONLY ▲
Attorneys for Plaintiffs: Reid Elkus (CO. BAR #32516) ELKUS & SISSON, P.C. 7100 E Belleview Avenue, Suite 101 Greenwood Village, CO 80111 Tel: (303) 567-7981 Scott Edward Cole* (CA BAR #160744) COLE & VAN NOTE 555 12th Street, Suite 2100 Oakland, California 94607 Tel: (510) 891-9800 *Admitted pro hac vice		
DECLARATION OF BRIAN KEARNEY IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, COSTS AND SERVICE AWARDS		

I, Brian Kearney, hereby declare as follows:

1. I am over the age of 18 and a named Plaintiff in this above-captioned matter and proposed class action against Defendants.
2. I make these statements based on personal knowledge and would so testify if called as a witness at trial. I make this Declaration in support of my respectful request for a class representative service award.
3. I provided my personally identifiable information (“PII”) and protected health information (“PHI”) to Defendants in connection with medical services I received.
4. On or about February 2023, I received Notice from Defendant Reventics, LLC, informing me Defendants’ internal administrative system was accessed by an unknown, unauthorized actor who gained access to and potentially acquired files containing my PII/PHI (the “Data Security Incident”). As such, I understand that my PII/PHI was likely stolen.
5. The Data Security Incident has caused me anxiety and emotional distress. An unknown person attempted to open a Bank of America credit card in my name. I believe that the Data Security Incident will negatively impact my credit score. I spent time reporting fraud and freezing credit accounts.
6. After receiving Notice, I initiated contact with my attorneys regarding the Data Security Incident in which my private data was potentially exposed to unauthorized individuals and subsequently commenced this lawsuit against Defendants. I also entered into a written representation agreement with my attorneys. The main purpose of the lawsuit is to stop and/or correct what I believe to be an unlawful business practice by Defendants in their systematic

failure to protect personal information they collected about me and other similarly situated individuals (“Class Members”).

7. Before commencing this lawsuit, my attorneys informed me of the responsibilities of a Class Representative. I understand these responsibilities include assuming fiduciary responsibility to prosecute the lawsuit on behalf of absent Class Members, making the decision to initiate the lawsuit, assisting with discovery (including sitting for a deposition) and, if the Class is certified, assisting with the trial, including appearing and testifying in Court and working with Class Counsel on behalf of the absent Class Members. Further, I am willing and prepared to put the interests of absent Class Members before my own and seek an outcome that is in the best interest of absent Class Members.

8. Through my attorneys, I reviewed the complaints and other filings and had the opportunity to provide input and feedback.

9. I discussed this matter at length on several occasions with my attorneys to assist in the investigation and discovery process before and after this case was filed. I made myself available during mediations as well as subsequent negotiations during the settlement process.

10. I spent time reviewing documents, investigating and otherwise assisting my attorneys with this case.

11. To my knowledge, I have no interest that is not in line with the absent Class Members, who I understand are people who also had their PII/PHI improperly exposed.

12. To my knowledge, I have no conflict of interest with my attorneys or the other absent Class Members.

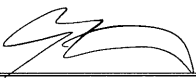
13. I consulted with my attorneys regarding the risks and expenses of continued litigation through trial and possible appeal, as well as about the benefits conferred by the proposed Settlement Agreement. My attorneys have kept me fully informed of the status of the litigation, particularly regarding the settlement process and discussions and the proposed Settlement.

14. I reaffirm my commitment to prosecute this case and assist my attorneys for the benefit of absent Class Members.

15. I believe the terms of the proposed Settlement are fair and reasonable. I also agree I should be provided with a \$2,500 Service Award for being a Class Representative. This seems like fair compensation for the work I put into the case, the risk of being required to pay defense attorneys' fees, and the reputational risk I suffered for being a named Plaintiff in this lawsuit.

16. There are no side agreements, and I am not receiving any special benefits through this Settlement as a result of my position as a Class Representative.

I declare under penalty of perjury under the laws of the state of Colorado that the foregoing is true and correct. Executed on May 23, 2025 in Lafayette, Colorado.



Brian Kearney