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SONY PICTURES ENTERTAINMENT INC.

14
15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 Michael Corona, Christina Mathis, et al.,
individually and on behalf of others
18 similarly situated,

19 Plaintiffs,

20 vs.

21 Sony Pictures Entertainment Inc.,
22 Defendant.

Case No. 2:14-cv-09600-RGK-E

**JOINT STATUS REPORT ON
SETTLEMENT**

Hearing Date: N/A
Time: N/A
Courtroom: 850
Judge: Hon. R. Gary
Klausner

1 Defendant Sony Pictures Entertainment Inc. (“SPE”) and Plaintiffs Michael
2 Corona, Christina Mathis, Joshua Forster, Ella Carline Archibeque, Marcela Bailey,
3 Michael Levine, Steven Shapiro, and Geoffrey Springer and the Settlement Class
4 (“Plaintiffs”), by and through their undersigned counsel, file this Report to update
5 the Court on developments related to the Settlement, preliminarily approved on
6 November 25, 2015, in this action. In particular, we would like to update the Court
7 on the implementation of one aspect of the relief to be offered to the Settlement
8 Class.

9 The Settlement provides three primary forms of relief to the Settlement
10 Class. *First*, SPE will establish a non-reversionary cash fund of \$2 million to
11 reimburse Settlement Class Members, subject to certain per-person caps, for
12 preventive measures they have taken to protect themselves from identity theft
13 following the SPE Cyberattack at issue in this case. Modified Settlement
14 Agreement, at ¶ 71. *Second*, SPE will pay up to \$2.5 million (up to \$10,000
15 individually) to Settlement Class Members who have experienced unreimbursed
16 losses from identity theft or misuse as a direct result of the SPE Cyberattack. *Id.* at
17 ¶ 70. *Third*, SPE will provide certain identity protection services to all Settlement
18 Class Members, free of charge, through December 31, 2017. *Id.* at ¶ 68.

19 With respect to the third form of relief described above—*i.e.*, identity
20 protection services—the Settlement Agreement anticipated that SPE would provide
21 such services through the company AllClear ID, and specifically through its
22 products AllClear Secure and AllClear PRO, with the latter provided to Settlement
23 Class Members who enroll, free of charge, in the service. The AllClear Secure
24 product provides assistance to recover financial losses and restore stolen identities.
25 The AllClear PRO product provides additional services including, among other
26 benefits, identity theft monitoring, credit monitoring, \$1 million in identity theft
27
28

1 insurance, fraud detection, lost wallet protection, and detection and restoration
2 services for identity theft associated with an enrollee's child.

3 The AllClear Secure product will be provided to all Settlement Class
4 Members and is not at issue here. SPE has learned, however, that AllClear ID will
5 not be able to provide the AllClear PRO service to any Settlement Class Members
6 who currently reside outside the United States and who do not have a United States
7 Social Security Number. In total, SPE estimates that this will affect less than 8
8 percent of the Settlement Class. AllClear PRO will be available to all other
9 Settlement Class Members as contemplated by the Settlement Agreement.

10 Accordingly, for any Settlement Class Members who currently reside
11 outside of the United States, SPE has arranged to provide substantially equivalent
12 identity protection services to them through an alternate company, called IDT911,
13 as follows: IDT911 will provide each enrollee with identity theft insurance
14 coverage of \$1 million, as well as fraud detection, lost wallet protection, and
15 detection and restoration services for identity theft associated with an enrollee's
16 child. IDT911 will also provide identity theft monitoring to enrollees who reside
17 in Canada, the United Kingdom, and other countries outside of the European
18 Union and, to the extent such identity theft monitoring service is available in their
19 country of residence, the European Union. IDT911 will also provide credit
20 monitoring for enrollees residing in Canada and the United Kingdom, which is
21 where the substantial majority (approximately 90 percent) of the non-U.S. resident
22 Settlement Class Members currently reside. IDT911 is unable to provide credit
23 monitoring in the other non-U.S. countries,¹ and SPE has not identified another
24 vendor that can do so. As with the AllClear PRO service, the IDT911 services will
25

26 _____
27 ¹ SPE estimates that less than one percent of the overall Settlement Class currently
28 resides outside of the United States, Canada, and the United Kingdom.

1 be available on an enrollment basis, free of charge to enrollees, for service through
2 December 31, 2017.

3 Appropriate modifications have been made to the notices and to the
4 Settlement Website to make sure Settlement Class Members residing outside of the
5 United States are aware of the IDT911 identity protection services available to
6 them and how they can enroll.

7
8 Dated: January 15, 2016

Respectfully submitted,

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*Pursuant to Local Rule 5-4.3.4(a)(2)(i), this signatory attests that the other signatories listed, on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.