

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
SOUTHERN DIVISION**

**CRAIG PEDERSON** and **DAVID BROWN** on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

**AAA COLLECTIONS, INC.,**

Defendant.

No. 4:22-cv-04166-RAL

Chief Judge Roberto A. Lange

**DECLARATION OF PLAINTIFF CRAIG PEDERSON IN SUPPORT OF PLAINTIFFS'  
MOTION FOR ATTORNEYS' FEES, COSTS, SERVICE AWARDS, AND FINAL  
APPROVAL OF CLASS ACTION SETTLEMENT**

I, Craig Pederson, declare under penalty of perjury the following:

1. I am a named Plaintiff in the above-captioned litigation. I submit this declaration in support of Plaintiffs' Motion for Attorneys' Fees, Costs, and Service Awards, as well as Plaintiffs' forthcoming Motion for Final Approval of Class Action Settlement.

2. I have personal knowledge of the facts set forth in this declaration and could testify competently to them if called upon to do so.

3. On or around November 16, 2022, I received a notice of the Data Incident concerning AAA Collections, Inc. The notice indicated that my personal information, including name and Social Security number, were compromised in the Data Incident.

4. After I received notice, I conducted research concerning the Data Incident and ultimately sought out and spoke with experienced attorneys to determine if I would retain them to handle my case. My attorneys spent significant time communicating with me about the facts of this case and the law, including what was involved in being a class representative.

5. Since agreeing to serve as a Plaintiff, I have diligently and faithfully fulfilled my obligations to the Class. I am unaware of any conflicts that would prevent me from serving as a class representative in this case.

6. I have participated in this litigation from its inception through settlement discussions and have been in regular contact with my attorneys throughout the course of this matter. Among other things, I spent time researching the facts of the Data Incident, my rights and those of the Class in bringing this lawsuit, communicating with my attorneys, gathering documents and information requested by my attorneys, and reviewing documents that were prepared for or filed in this action. I have always made myself available to discuss developments in the case.

7. I am familiar with the work involved in prosecuting this action and have worked with my attorneys to obtain the relief provided by the settlement. In my opinion, Class Counsel have fairly, adequately, and vigorously represented the interests of the Class in this case.

8. I understand that the settlement benefits afforded to me and the approximately 66,488 other similarly-situated individuals includes an \$865,000 settlement fund that will be used to make cash payments to me and other class members submitting valid claims after the reduction of my counsels' attorneys' fees and expenses, any settlement administration costs and expenses, and the potential class representative service awards. I also understand that AAA has implemented and maintained important business practice changes that will decrease the likelihood of a future data incident.

9. I believe that the Settlement benefits are a great result for me and my fellow Class Members. I strongly support this Settlement and the benefits recovered and believe they are more than reasonable.

10. I believe Class Counsel's request for attorneys' fees of 1/3 the \$865,000 common fund (\$288,333.33) plus their reasonable expenses is fair and adequate under the circumstances of this case.

11. By serving as a Class Representative in this action, I bore a certain amount of risk that other Class members did not bear. In addition to the time I spent participating in the prosecution of this case, I took a risk by coming forward and filing this class action, putting my personal information into the public sphere. I was willing to participate in this case through the discovery process, depositions, and through trial if there had not been a settlement. As a result of my stepping forward and conducting a pre-suit investigation, Class members will receive the benefits of the settlement to compensate them for the injuries directly and proximately caused by Defendant's failure to implement or maintain adequate data security measures to safeguard sensitive personal information from unauthorized access and disclosure.

12. I respectfully request that the Court award me \$5,000 for my service to the Class in this case.

Pursuant to 28 U.S.C. § 1746, I declare and sign under penalty of perjury of the United States of America that the foregoing is true and correct.

Executed on December 30, 2023 in Madison, South Dakota.

Craig E Pederson  
Craig E Pederson (Dec 30, 2023 15:24 CST)

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Craig Pederson