

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____)	
NICOLETTA PANTELYAT, MICHAEL)	
EDWARDS, and ISABELLE SCHERER,)	
Individually and on Behalf of All Others)	
Similarly Situated,)	
)	
Plaintiffs,)	Civil Action No. 1:16-cv-08964-AJN
)	
v.)	
)	
BANK OF AMERICA, N.A. and BANK OF)	
AMERICA CORPORATION,)	
)	
Defendants.)	
_____)	

**DECLARATION OF PATRICE HENDRIKSEN REGARDING CLASS ACTION
FAIRNESS ACT NOTICE AND COMPLIANCE WITH NOTICE REQUIREMENTS**

1. I am an attorney with Goodwin Procter LLP, counsel for Defendants Bank of America, N.A. and Bank of America Corp. (together, “Bank of America”) in this matter. I make this declaration based on my personal knowledge.

2. On January 29, 2018, pursuant to Section 3 of the Class Action Fairness Act, 28 U.S.C. § 1715, I served notice of this proposed settlement upon the Attorney General of the United States, the Federal Reserve Bank, the Office of the Comptroller of the Currency, the Comptroller of the Currency National Bank Examiner, the Consumer Financial Protection Bureau, and the appropriate State officials of the 54 States and territories where at least one class member has a last known address of record.

3. In accordance with 28 U.S.C. § 1715(b), the Notice included a CD with copies of: (1) the Complaint (ECF No. 1) and Plaintiff N. Pantelyat’s January 19, 2018 Motion for Leave to File a First Amended Class Action Complaint and Exhibits (ECF No. 62); (2) Plaintiffs’ Notice of Motion for Preliminary Approval of Class Action Settlement and Exhibits (ECF No. 63);

(3) Plaintiffs' Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement (ECF No. 64) and supporting Declarations of Robert Ahdoot (ECF No. 65), Cameron Azari (ECF No. 66), and Deborah Goldstein (ECF No. 67); (4) the proposed settlement class notice in this action; and (5) the Settlement Agreement and Exhibits.

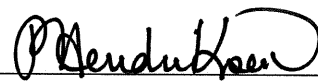
4. In accordance with 28 U.S.C. § 1715(b), the Notice also included (1) the names of class members who reside in each pertinent State as determined from Bank of America's records and based on its preliminary investigation; and (2) the estimated proportionate share of the claims of the class members in the pertinent State to the entire settlement.

5. Pursuant to paragraphs 62 and 63 of the Settlement Agreement, on March 29, 2018 (within fourteen days of the Preliminary Approval Date), Bank of America provided the Settlement Class Member List (as this term is defined in the Settlement Agreement) to the Settlement Administrator.

6. Pursuant to paragraph 71 of the Settlement Agreement, Bank of America also provided the most current email addresses available, if any, for the Settlement Class Members for whom the Settlement Administrator represented that it was unable to ascertain a deliverable address, to the extent consistent with its privacy policies and customer notification practices.

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

Executed on July 3, 2018.



Patrice Hendriksen