

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

IN RE: AMAZON RETURN LITIGATION

Case No. 2:23-cv-01372-JNW

**DECLARATION OF STEVEN WEISBROT
OF ANGEION GROUP
RE: STATUS OF ADMINISTRATION**

1 I, Steven Weisbrot, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the
2 following is true and correct:

3 1. I am the President and Chief Executive Officer at the class action notice and claims
4 administration firm Angeion Group, LLC (“Angeion”). I am fully familiar with the facts contained
5 herein based upon my personal knowledge, as well as information that has been provided to me by
6 my colleagues in the ordinary course of business at Angeion.

7 2. My credentials were provided in my prior declaration outlining the Proposed Notice
8 Plan in this settlement (“Notice Plan Declaration”) (ECF No. 171-4).

9 3. Angeion is not related to or affiliated with the Plaintiffs, Plaintiffs’ Counsel,
10 Defendant, or Defendants’ Counsel.

11 4. Angeion has been selected by the Parties to serve as Settlement Administrator
12 pending this Court’s approval. The purpose of this declaration is to provide the Court with a
13 summary of the work performed by Angeion thus far.

14 **NOTICE PURSUANT TO 28 U.S.C. § 1715**

15 5. On February 2, 2026, on behalf of Defendant, Angeion caused notice of this
16 Settlement and related materials to be sent to the Attorneys General of all U.S. states and territories,
17 as well as the Attorney General of the United States (“CAFA Notice”). A true and accurate copy of
18 the CAFA Notice is attached hereto as **Exhibit A**.

19 6. On April 9, 2026, on behalf of Defendant, Angeion caused supplemental information
20 concerning the Settlement to be sent to the Attorneys General of all U.S. states and territories, as
21 well as the Attorney General of the United States (“Supplemental CAFA Notice”). A true and
22 accurate copy of the Supplemental CAFA Notice is attached hereto as **Exhibit B**.

23 **CLASS DATA**

24 7. On or about February 13, 2026, Defendant provided Angeion with data files
25 containing names, mailing addresses, email addresses, order numbers, product numbers, return
26 details, and item totals. Supplemental data files were provided to Angeion on March 5, 2026, and
27 April 17, 2026. Angeion aggregated the records in the data files and performed an analysis to identify
28 duplicative records, incorporate the email cleansing, and complete address analysis.

SETTLEMENT WEBSITE

8. At the direction of the Parties, Angeion acquired and launched the case-specific website dedicated to this Settlement, www.ReturnSettlement.com (the “Settlement Website”). The Settlement Website currently states that details about the Settlement will be made available after preliminary approval is granted.

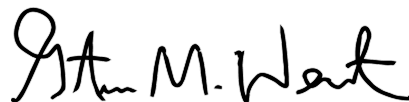
EARNED MEDIA

9. The notice plan and Settlement resulted in a substantial amount of “earned media” coverage (i.e., other media outlets and/or publications reported on the proposed Settlement), including articles published on the websites of MSN, Reuters, Associated Press and other digital media outlets. See, e.g., Aisha Maik, Amazon agrees to pay consumers \$309M in returns policy settlement, <https://www.msn.com/en-us/money/companies/amazon-agrees-to-pay-consumers-309m-in-returns-policy-settlement/ar-AA1V6TQ1?ocid=finance-verthp-feeds> (Jan. 27, 2026); Mike Scarcella, Amazon to pay \$309 million to U.S. shoppers in settlement over returns, <https://www.reuters.com/legal/government/amazon-pay-309-million-us-shoppers-settlement-over-returns-2026-01-26/> (Jan. 26, 2026); Ben Mitchell, Amazon to pay \$309M class action settlement: Are you eligible? <https://pix11.com/news/local-news/amazon-to-pay-309m-class-action-settlement-are-you-eligible/> (Jan. 28, 2026). A report detailing the Earned Media is attached hereto as **Exhibit C**.

10. As described in the Notice Plan Declaration, Angeion will aggregate data across multiple platforms and systems to quantify the output of print, online, and broadcast coverage of this settlement. At the conclusion of the notice and claims period, Angeion will provide reporting that quantifies and assigns value to garnered press coverage.

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

Dated: June 4, 2026



STEVEN WEISBROT

EXHIBIT A



1650 Arch Street • Suite 2210 • Philadelphia PA 19103
www.angeiongroup.com

February 02, 2026

VIA USPS PRIORITY MAIL

United States Attorney General & Appropriate Officials

Re: Notice of Proposed Class Action Settlement

Dear Counsel or Official:

Angeion Group, an independent claims administrator, on behalf of the defendant in the below-described action, hereby provides your office with this notice under the provisions of the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, to advise you of the following proposed class action settlement:

Case Name: *In re: Amazon Return Policy Litigation*

Case No.: 2:23-cv-01372

Jurisdiction: United States District Court for the Western District of Washington at Seattle

Date Settlement Filed with Court: January 23, 2026

In accordance with the requirements of 28 U.S.C. § 1715, copies of the following documents associated with this action are available at <https://cafa.angeiongroup.com/return-policy-litigation/>:

- 1. 28 U.S.C. § 1715(b)(1)-Complaint:** *The Class Action Complaint* was filed with the Court on September 5, 2023. The *Consolidated Class Action Complaint* was filed with the Court on March 25, 2024. The *First Amended Consolidated Class Action Complaint* was filed with the Court on May 23, 2025.
- 2. 28 U.S.C. § 1715(b)(2)-Notice of Any Scheduled Judicial Hearings:** There are currently no scheduled hearings for this case as of the date of this Notice.
- 3. 28 U.S.C. § 1715(b)(3)-Notification to Class Members:** The proposed *Claim Form, Email Notice, Reminder Email Notice, Long Form Notice* and *Press Release* were filed with the Court on January 23, 2026.

Notice of Proposed Class Action Settlement

4. **28 U.S.C. § 1715(b)(4)-Class Action Settlement Agreement:** The *Settlement Agreement*, *Plaintiffs' Motion for Preliminary Approval of Settlement and Issuance of Notice*, *Declaration of John Holton in Support of Plaintiffs' Motion for Preliminary Approval*, *Declaration of Layn R. Phillips in Support of Plaintiffs' Motion for Preliminary Approval*, and *Declaration of Steven Weisbrot of Angeion Group Re: Proposed Notice Plan* were filed with the Court on January 23, 2026. All documents are also available at <https://cafa.angeiongroup.com/return-policy-litigation/>.
5. **28 U.S.C. § 1715(b)(5)-Any Settlement or Other Agreements:** Other than the Settlement Agreement, there are no other settlements or agreements made between the parties related to the proposed settlement.
6. **28 U.S.C. § 1715(b)(6)-Final Judgment:** As of the date of this Notice, no Final Judgment or notice of dismissal has been entered in this case.
7. **28 U.S.C. § 1715(b)(7)(B)-Estimate of Class Members:** The products that are the subject of the settlement are sold nationwide through Amazon. The names and number of class members will depend on class members providing information, including through claim forms, as to whether Amazon allegedly incorrectly did not provide refunds for product returns or incorrectly recharged customers for product returns. In addition, class members may have moved from one State to another State between the time of their return(s) at issue in the litigation and the present. Accordingly, it is not feasible to provide the names of individual class members residing in each State and/or the estimated number of class members residing in each State under 28 U.S.C. § 1715 (b)(7) at this time.
8. **28 U.S.C. § 1715(b)(8)-Judicial Opinions Related to the Settlement:** The Court has not issued a judicial opinion concerning the proposed settlement at this time. The [Proposed] Order on Plaintiffs' Motion for Preliminary Approval is available at <https://cafa.angeiongroup.com/return-policy-litigation/>.

If you have any questions regarding the details of this notice, please contact Defendant at:

Moez Kaba
Brandon Marsh
HUESTON HENNIGAN LLP
523 West 6th Street, Suite 400
Los Angeles, CA 90014

Jedediah Wakefield
Deena Feit
Fenwick & West LLP
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Notice of Proposed Class Action Settlement

Telephone: (213) 788-4340
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Email: dfeit@fenwick.com

If you need assistance accessing the CAFA website, please contact Angeion Group at:

Angeion Group

1650 Arch Street, Suite 2210

Philadelphia PA 19103

www.angeiongroup.com

CAFA@angeiongroup.com

EXHIBIT B



1650 Arch Street • Suite 2210 • Philadelphia PA 19103
www.angeiongroup.com

April 9, 2026

VIA USPS PRIORITY MAIL

United States Attorney General & Appropriate Officials

Re: Notice of Proposed Class Action Settlement

Dear Counsel or Official:

On February 2, 2026, Angeion Group, an independent claims administrator, on behalf of the defendant in the below-described action, provided your office with a notice under the provisions of the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, to advise you of the following proposed class action settlement:

Case Name: *In re: Amazon Return Policy Litigation*

Case No.: 2:23-cv-01372

Jurisdiction: United States District Court for the Western District of Washington at Seattle

Date Settlement Filed with Court: January 23, 2026

Angeion is sending this supplemental letter on behalf of the defendant to provide additional information about the settlement. As explained in the notice, the names and number of class members will depend on class members providing information, including through claim forms, as to whether Amazon allegedly incorrectly did not provide refunds for product returns, provided incorrect refunds, or incorrectly recharged customers for product returns. Such claim forms will be made available following preliminary approval of the settlement, which has not yet occurred. In addition, settlement class members may have moved from one State to another State between the time of their return(s) at issue in the litigation and the present. Accordingly, it is not feasible to provide the names of individual class members residing in each State and/or the estimated number of class members residing in each State under 28 U.S.C. § 1715(b)(7) at this time.

Amazon has, however, performed an additional analysis related to 28 U.S.C. § 1715(b)(7). Following service of the CAFA notice, Amazon collected and sent Class Data to the settlement administrator in late February 2026. Based on such Class Data, Amazon has assembled estimated information relating to the relative distribution of potential class members on a state-by-state basis pursuant to 28 U.S.C. § 1715(b)(7)(B) (referencing “a

Supplement to Notice of Proposed Class Action Settlement

reasonable estimate of the number of class members residing in each State and the estimated proportionate share of the claims of such members to the entire settlement”).

The chart in Appendix A hereto estimates the number of people in each state and additional locations who will receive notice of the settlement. The chart in Appendix B hereto estimates the proportionate share of their transaction values. The estimates in Appendices A and B may change as Amazon continues to verify and update the data, and class members change locations.

If you have any questions regarding the details of this letter, please contact Defendant at:

Moez Kaba
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523 West 6th Street, Suite 400
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Supplement to Notice of Proposed Class Action Settlement

Appendix A

State/Territory/Address	Subclass A	Subclass B¹	Total²
Alabama	83,159	548,817	577,156
Alaska	12,954	96,586	100,948
American Samoa	69	454	511
APO	1,280	9,226	9,690
APO AA	2,297	14,104	14,833
APO AE	2,385	15,457	16,268
APO STA		3	3
Arizona	215,794	1,274,522	1,331,671
Arkansas	43,746	300,987	316,845
California	1,192,480	6,503,882	6,795,455
Colorado	224,706	973,716	1,023,089
Connecticut	103,802	603,980	632,532
Delaware	32,990	194,683	205,073
District of Columbia	20,338	115,931	121,911
DPO	524	3,129	3,265
Federated States of Micronesia	23	353	363
Florida	738,735	4,161,231	4,359,517
FPO	602	4,582	4,838
FPO AA	4,305	24,687	25,755
FPO AE	482	2,977	3,112

¹ As specified in the Settlement Agreement, members of Subclass A will receive automatic payments pursuant to the Settlement. Members of Subclass B, however, will receive payments only to the extent that they submit claim forms and supporting evidence sufficient to show that they are more likely than not members of the Settlement Class.

² The totals in this column are smaller than the sum of the Subclass A and Subclass B columns because some people are members of both subclasses, and these totals are de-duplicated between Subclass A and B.

Supplement to Notice of Proposed Class Action Settlement

State/Territory/Address	Subclass A	Subclass B ¹	Total ²
Georgia	273,299	1,632,583	1,709,359
Guam	1,009	8,356	8,780
Hawaii	31,637	199,219	208,253
Idaho	40,675	245,345	257,989
Illinois	336,976	1,891,693	1,979,280
Indiana	133,309	867,132	908,978
Iowa	62,966	402,960	422,869
Kansas	55,871	356,756	373,973
Kentucky	79,322	541,800	568,065
Louisiana	82,594	531,008	557,146
Maine	25,292	182,446	191,987
Marshall Islands	19	128	137
Maryland	183,114	1,044,389	1,094,440
Massachusetts	191,031	1,135,168	1,190,931
Michigan	241,731	1,456,502	1,523,948
Minnesota	125,382	741,484	776,358
Mississippi	40,200	274,985	289,607
Missouri	136,176	826,962	868,327
Montana	19,143	141,549	148,359
Nebraska	36,467	237,979	249,519
Nevada	84,785	500,131	523,770
New Hampshire	40,817	241,813	254,601
New Jersey	313,471	1,676,205	1,750,560
New Mexico	30,916	209,866	220,942
New York	564,593	3,100,845	3,244,870

Supplement to Notice of Proposed Class Action Settlement

State/Territory/Address	Subclass A	Subclass B ¹	Total ²
North Carolina	256,601	1,575,334	1,650,620
North Dakota	11,178	80,836	84,717
Northern Mariana Islands	119	1,219	1,269
Ohio	247,054	1,582,195	1,656,727
Oklahoma	72,230	462,004	486,817
Oregon	111,673	690,105	724,810
Palau	21	281	295
Pennsylvania	296,750	1,818,457	1,909,074
Puerto Rico	17,173	119,965	127,281
Rhode Island	22,411	141,336	148,022
South Carolina	118,482	746,286	782,057
South Dakota	15,124	103,609	108,925
Tennessee	150,716	952,864	998,409
Texas	705,481	4,218,613	4,416,889
Utah	95,950	524,875	549,953
Vermont	17,041	115,298	121,151
Virgin Islands	1,513	8,403	8,895
Virginia	229,676	1,349,810	1,416,354
Washington	233,448	1,319,470	1,384,945
West Virginia	24,047	177,713	186,757
Wisconsin	127,811	810,670	848,255
Wyoming	9,797	64,372	68,042
International zip code as the default/latest address	52,546	304,659	331,943
Invalid zip code	72,320	426,956	462,065

Supplement to Notice of Proposed Class Action Settlement

Appendix B

State/Territory/Address	Subclass A	Subclass B	Overall
Alabama	0.87%	0.92%	0.92%
Alaska	0.15%	0.18%	0.18%
American Samoa	0.00%	0.00%	0.00%
APO	0.01%	0.01%	0.01%
APO AA	0.03%	0.02%	0.02%
APO AE	0.03%	0.02%	0.02%
APO STA	0.00%	0.00%	0.00%
Arizona	2.51%	2.64%	2.62%
Arkansas	0.47%	0.50%	0.49%
California	15.95%	14.99%	15.11%
Colorado	2.29%	1.90%	1.94%
Connecticut	1.13%	1.16%	1.16%
Delaware	0.57%	0.41%	0.43%
District of Columbia	0.28%	0.24%	0.24%
DPO	0.01%	0.01%	0.01%
Federated States of Micronesia	0.00%	0.00%	0.00%
Florida	9.03%	8.85%	8.88%
FPO	0.01%	0.01%	0.01%
FPO AA	0.05%	0.05%	0.05%
FPO AE	0.01%	0.00%	0.00%
Georgia	3.08%	3.17%	3.16%
Guam	0.01%	0.01%	0.01%
Hawaii	0.40%	0.41%	0.41%
Idaho	0.46%	0.45%	0.45%

Supplement to Notice of Proposed Class Action Settlement

State/Territory/Address	Subclass A	Subclass B	Overall
Illinois	3.57%	3.80%	3.77%
Indiana	1.32%	1.48%	1.46%
Iowa	0.63%	0.69%	0.68%
Kansas	0.55%	0.62%	0.62%
Kentucky	0.79%	0.89%	0.88%
Louisiana	0.86%	0.92%	0.91%
Maine	0.26%	0.27%	0.27%
Marshall Islands	0.00%	0.00%	0.00%
Maryland	1.98%	2.00%	1.99%
Massachusetts	2.10%	2.05%	2.06%
Michigan	2.45%	2.75%	2.72%
Minnesota	1.30%	1.30%	1.30%
Mississippi	0.41%	0.43%	0.43%
Missouri	1.32%	1.42%	1.41%
Montana	0.21%	0.23%	0.23%
Nebraska	0.36%	0.41%	0.40%
Nevada	1.07%	1.03%	1.04%
New Hampshire	0.49%	0.42%	0.43%
New Jersey	3.79%	3.72%	3.73%
New Mexico	0.34%	0.34%	0.34%
New York	6.89%	6.78%	6.80%
North Carolina	2.63%	2.83%	2.81%
North Dakota	0.12%	0.13%	0.13%
Northern Mariana Islands	0.00%	0.00%	0.00%
Ohio	2.43%	2.76%	2.72%

Supplement to Notice of Proposed Class Action Settlement

State/Territory/Address	Subclass A	Subclass B	Overall
Oklahoma	0.76%	0.78%	0.78%
Oregon	1.31%	1.25%	1.25%
Palau	0.00%	0.00%	0.00%
Pennsylvania	2.96%	3.12%	3.10%
Puerto Rico	0.21%	0.20%	0.20%
Rhode Island	0.22%	0.24%	0.24%
South Carolina	1.22%	1.35%	1.33%
South Dakota	0.15%	0.17%	0.17%
Tennessee	1.66%	1.76%	1.75%
Texas	8.18%	8.34%	8.32%
Utah	1.17%	1.13%	1.13%
Vermont	0.17%	0.19%	0.19%
Virgin Islands	0.02%	0.01%	0.01%
Virginia	2.43%	2.47%	2.46%
Washington	3.04%	2.70%	2.74%
West Virginia	0.24%	0.26%	0.26%
Wisconsin	1.25%	1.43%	1.40%
Wyoming	0.12%	0.11%	0.11%
International zip code as the default/latest address	0.78%	0.53%	0.56%
Invalid zip code	0.90%	0.69%	0.72%

EXHIBIT C



Earned Media Measurement Report

What are the key results for the timeframe?

Mentions

Jan 23 - Feb 26

258 ↑ 337%
Previous Period 59

Total Potential News Reach

Jan 23 - Feb 26

927M ↑ 4473%
Previous Period 20.3M

Sentiment

Jan 23 - Feb 26

36 ↑ 136%
Previous Period -100

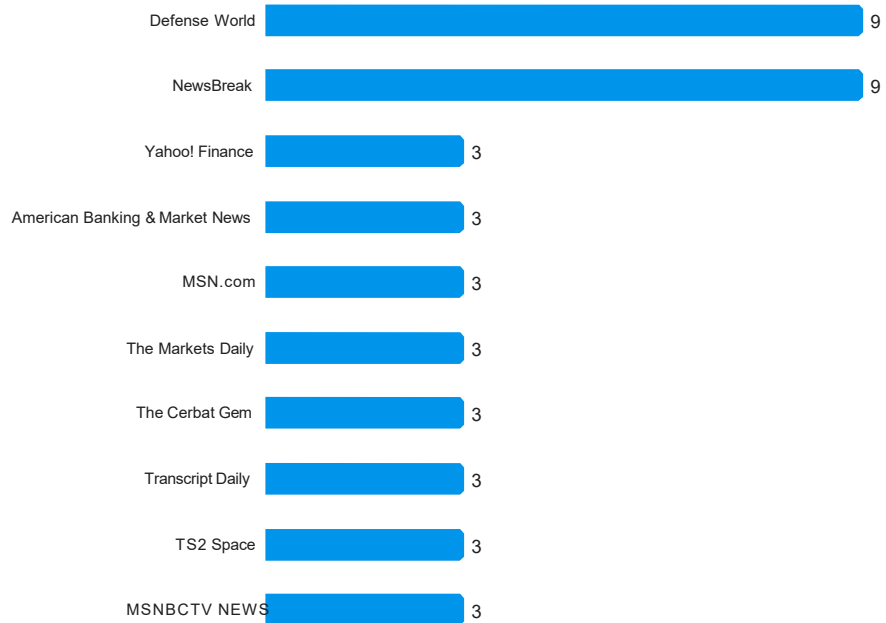
How does the earned media break down?



What are the top publishers?

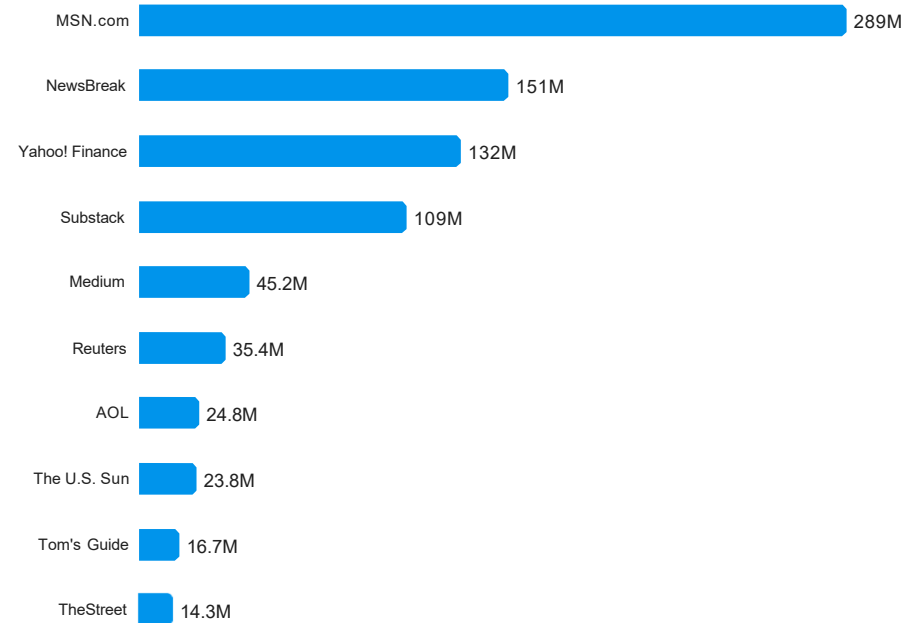
Top Publications by Mentions

Jan 23 - Feb 26



Top Publications by Editorial Reach

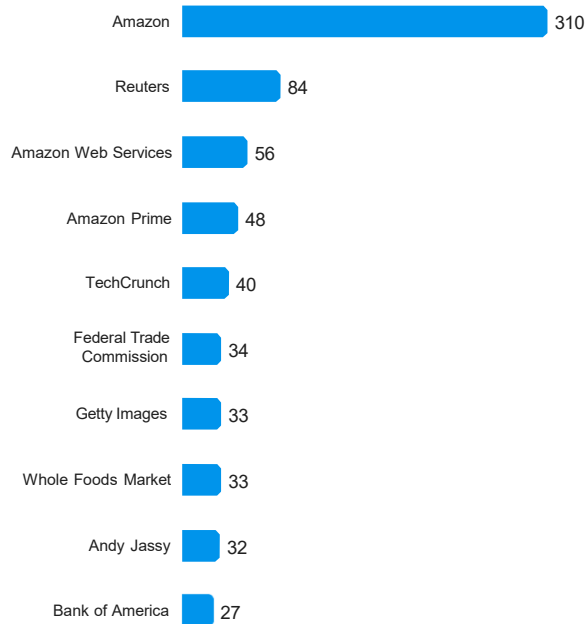
Jan 23 - Feb 26



What are the top entities and keywords?

Top Entities

Jan 23 - Feb 26



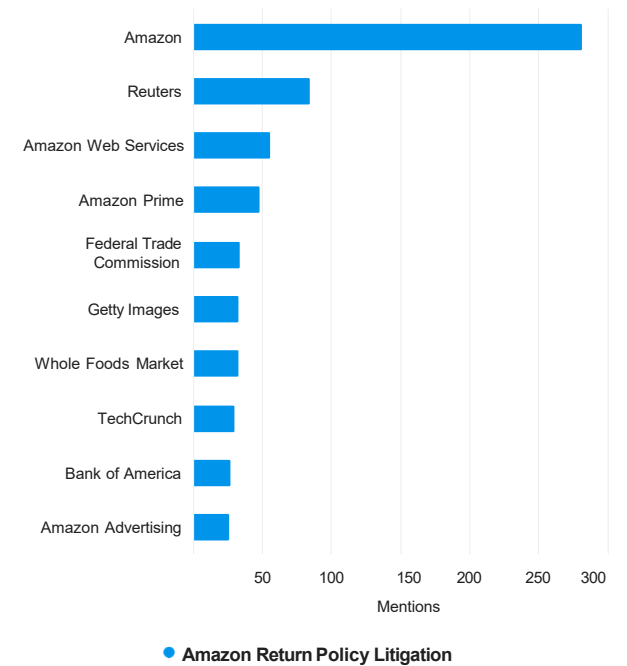
Top Keywords

Jan 23 - Feb 26



Top Organizations and Share of Voice

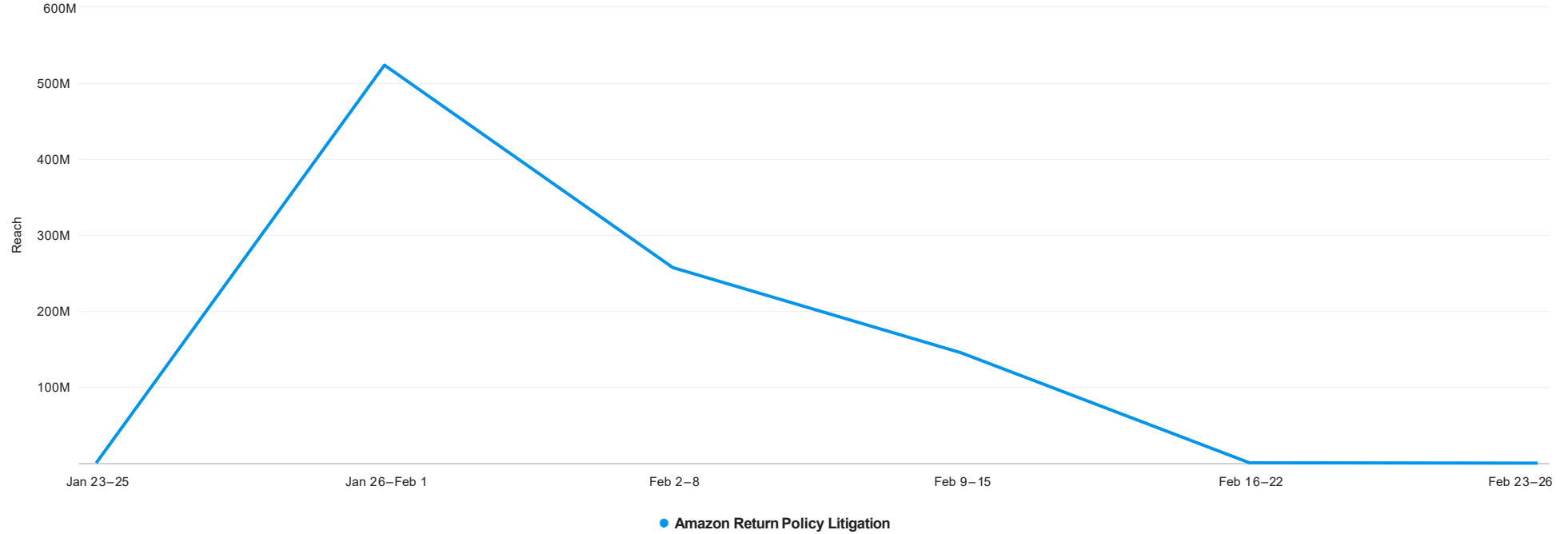
Jan 23 - Feb 26



What is the potential reach?

Potential News Reach

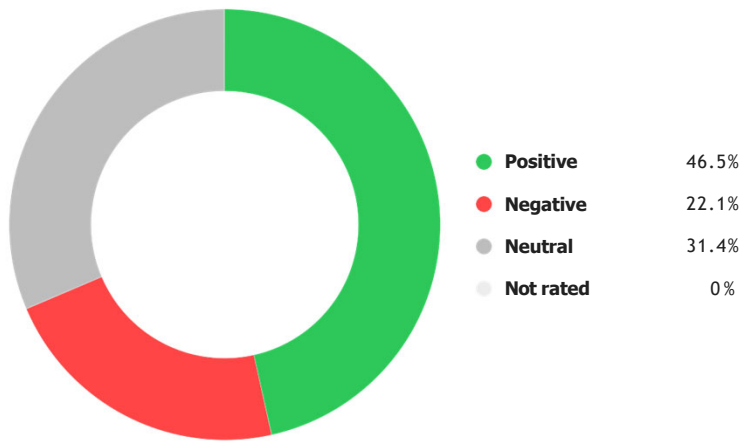
Jan 23 - Feb 26



How favorable is the content?

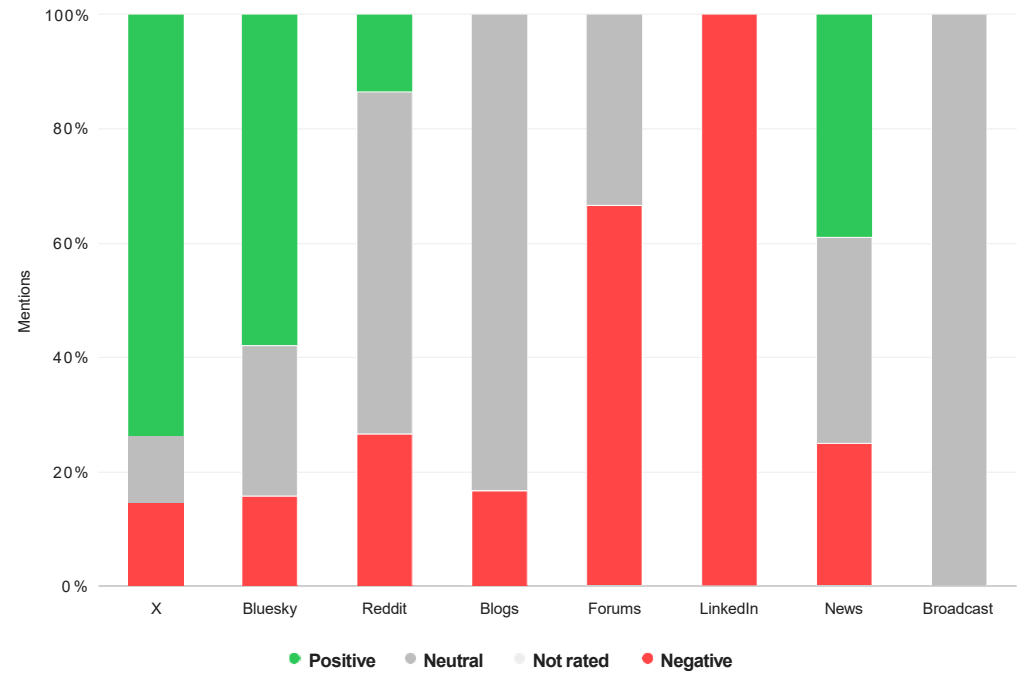
Sentiment Share of Voice

Jan 23 - Feb 26



Sentiment by Source Type

Jan 23 - Feb 26



CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record via the ECF system.

DATED June 4, 2026.

/s/ Nolan Anderson
Nolan Anderson, WSBA #59691