

EXHIBIT 3

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THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

In re Progressive Leasing Breach Litigation

**DECLARATION OF KAYLIE
O’CONNOR (ON BEHALF OF CPT
GROUP, INC.) REGARDING
SETTLEMENT ADMINISTRATION**

Case No. 2:23-cv-00783-DBB-CMR

District Judge David Barlow

1 I, Kaylie O'Connor declare as follows:

2 1. I am employed as a Senior Case Manager at CPT Group, Inc. ("CPT"), the
3 Settlement Administrator jointly agreed upon by the Parties and approved by the Court for *In re*
4 *Progressive Leasing Breach Litigation*. The following statements are based on my personal
5 knowledge, information provided to me by counsel for the Parties, by other CPT employees
6 working on this matter, and records of CPT generated and maintained in the usual course of its
7 business. If called on to do so, I could and would testify competently thereto. I submit this
8 declaration in support of the Plaintiffs' Motion for Final Approval of Class Action Settlement.

9 2. CPT has extensive experience in providing notice of class actions and administering
10 class action settlements. In the past 30-plus years, we have provided notification and/or
11 settlement administration services in thousands of class action cases.

12 **SUMMARY OF NOTICE PLAN AND ADMINISTRATIVE DUTIES**

13 3. As the Settlement Administrator in this matter, CPT was tasked with providing
14 notice and claims administration services as outlined in the Parties' Settlement Agreement. These
15 responsibilities included, but are not limited to, the following:

- 16 a. Obtaining Class Members' contact information from Defendant and
17 updating addresses using the National Change of Address (NCOA)
18 database.
- 19 b. Preparing, printing and disseminating the Postcard Notice and/ or Email
20 Notice to Class Members and sending Long Form Notices and paper Claim
21 Forms upon request.
- 22 c. Establishing a dedicated Settlement Website, which includes links to the
23 Court-approved documents, allows online submission of claims, and
24 provides up-to-date information regarding the case.
- 25 d. Establishing a dedicated 24-hour toll-free support line with Interactive
26 Voice Response (IVR) capabilities.
- 27 e. Reviewing and determining the validity of submitted Claim Forms.

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- 1 f. Notifying claimants who submit deficient claims and providing them with
- 2 clear instructions to correct deficiencies.
- 3 g. Receiving and processing other communications about the Settlement such
- 4 as questions about the claims process, Requests for Exclusion, and
- 5 Objections.
- 6 h. Preparing reports and summaries regarding the notice and claims process
- 7 for the Parties and the Court.
- 8 i. Establishing and maintaining a Qualified Settlement Fund.
- 9 j. Calculating and distributing Settlement Payments to Class Members via
- 10 mailed check or electronic distribution.
- 11 k. Emailing Credit Monitoring activation codes to Settlement Class Members
- 12 who elect Credit Monitoring.
- 13 l. Performing other tasks as set forth in the Preliminary Approval Order, the
- 14 Settlement Agreement, or as the Parties mutually agree to or that the Court
- 15 orders.

16 **PROVISION OF CLASS DATA**

17 4. On November 6, 2025, CPT received three spreadsheets containing the names and
18 contact information for approximately two hundred sixteen thousand nine hundred thirty-four
19 (216,934) individuals.

20 5. CPT scrubbed the data for anomalies and duplicates. As a result, a refined master
21 list of two hundred fifteen thousand nine hundred twenty-four (215,924) Class Members referred
22 to as the “Class List,” was compiled. CPT assigned a unique ID to each record to be used for
23 tracking purposes throughout the course of the administration.

24 6. The Class List contained mailing addresses for two hundred twelve thousand
25 seventy-seven (212,077) Class Members and email addresses for an additional three thousand
26 eight hundred forty-five (3,845) Class Members. There were two (2) Class Members for whom
27

1 no mailing address or email address was available.

2 **TOLL-FREE NUMBER**

3 7. CPT established a case-specific 24-hour toll-free telephone number (1-888-453-
4 0434) that went live on December 4, 2025. Calls received are prompted through interactive voice
5 recognition (“IVR”) Frequently Asked Questions (“FAQs”). The toll-free telephone number was
6 included on the Postcard Notice and Email Notice. In addition, it is listed in several locations on
7 the Settlement Website, including the footer and Contact-Us page.

8 8. As of the date of this declaration, the toll-free telephone number has received eight
9 hundred forty-nine (849) phone calls.

10 **CASE-SPECIFIC EMAIL ADDRESS**

11 9. CPT established a dedicated case email address (PLSettlement@cptgroup.com) and
12 inbox which was activated on December 4, 2025. The email address was listed on the Postcard
13 Notice and Email Notice and is listed in several locations on the Settlement Website, including
14 the footer and Contact-Us page. Class Members can use this email address to communicate with
15 CPT if they have questions about the case and/or settlement.

16 **SETTLEMENT WEBSITE**

17 10. CPT established a dedicated Settlement Website (www.PLSettlement.com), which
18 went live on December 4, 2025. The Settlement Website includes a Court Documents page that
19 contains links to downloadable versions of case documents, including the Settlement Agreement,
20 Preliminary Approval Order, Long Form Notice and Claim Form.

21 11. An Important Dates page on the Settlement Website lists the settlement deadlines
22 for submitting a Claim Form, filing a Request for Exclusion, or filing an Objection, as well as
23 the date and time of the Final Approval Hearing.

24 12. Additionally, the website provides a link allowing Class Members to submit a
25 Claim Form electronically, which will remain active until 11:59 p.m. on the deadline to submit
26 a Claim Form (January 22, 2026).

27 13. CPT will continue to maintain and update the Settlement Website with relevant
28

1 documents, including the Final Approval Order and Judgment once entered by the Court, and
2 other updates as necessary.

3 14. As of the date of this declaration, the Settlement Website has received
4 approximately sixty-one thousand (61,000) website page views.

5 **DIRECT NOTICE**

6 15. On December 5, 2025, CPT disseminated the Email Notice to the three thousand
7 eight hundred forty-five (3,845) Class Members for whom an email address was available.
8 Attached as **Exhibit A** is a true and correct copy of the Email Notice mockup.

9 16. A total of one hundred six (106) Email Notices were returned as bounced or
10 undeliverable.

11 17. For the two hundred twelve thousand seventy-seven (212,077) Class Members
12 without an email address, CPT mailed the Postcard Notice by First Class Mail. Prior to mailing,
13 CPT checked all mailing addresses against the National Change of Address (NCOA) database
14 to ensure that notices were sent to the most current addresses available. Attached hereto as
15 **Exhibit B** is a true and correct copy of the Postcard Notice.

16 18. As of the date of this declaration, the United States Postal Service (“USPS”) has
17 returned a total of one thousand one hundred eighty-seven (1,187) Postcard Notices. For the
18 Postcard Notices returned without a forwarding address, CPT conducted skip tracing using
19 Accurint, one of the most comprehensive address-location tools available. Accurint utilizes
20 hundreds of different databases supplied by credit supporting agencies, public records, and a
21 variety of other national databases.

22 19. As a result of CPT’s skip-trace efforts or upon request from a Class Member, a total
23 of eight hundred twelve (812) Postcard Notices have been re-mailed to date. Additionally, three
24 (3) Postcard Notices were forwarded automatically by the USPS because a forwarding address
25 was on file.

26 20. As of the date of this declaration, three hundred eighty-nine (389) Postcard Notices
27 have been deemed undeliverable where no forwarding address was available, and no updated
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1 address could be identified through skip tracing. Thus, as of the date of this declaration, of the
2 two hundred fifteen thousand nine hundred twenty-four (215,924) Settlement Class Members in
3 the Class List, notice reached approximately two hundred fifteen thousand four hundred twenty-
4 five (215,425) Settlement Class Members – reflecting a direct reach rate of approximately
5 99.8%. This reach rate is consistent with other court-approved notice programs and exceeds the
6 70% threshold identified in the Federal Judicial Center’s guidelines as satisfying the “best
7 practicable” standard under due process.

8 **CLAIMS ADMINISTRATION**

9 21. The deadline for Class Members to submit a Claim Form is January 22, 2026
10 (“Claims Deadline”).

11 22. Upon receipt of a Claim Form, CPT reviews each submitted Claim Form to
12 determine whether it is valid, invalid, or deficient. When a Claim Form is determined to be
13 deficient, CPT sends a Notice of Deficiency advising the Class Member of the deficiency and
14 providing the Class Member an opportunity to cure the deficiency.

15 23. As of the date of this declaration, CPT has received and processed a total of ten
16 thousand nine hundred twenty-five (10,925) Claim Forms. In addition, CPT has recently
17 received approximately four thousand three hundred (3,200) Postcard Claims Forms which are
18 pending processing.

19 a. Documented Losses. Of the ten thousand nine hundred twenty-five (10,925)
20 Claim Forms submitted and processed to date, one hundred eleven (111) claimed Documented
21 Losses totaling \$311,828.69. As of the date of this declaration, no claims for Documented Losses
22 are approved, thirty (30) Documented Losses have been deemed deficient, fourteen (14) have
23 been deemed invalid and sixty-seven (67) are under review.

24 b. California Statutory Payment. Of the ten thousand nine hundred twenty-five
25 (10,925) Claim Forms submitted and processed to date, sixty-four (64) claimed a California
26 Statutory Payment. As of the date of this declaration, fourteen (14) claims for a California
27 Statutory Cash Payment are approved, fifteen (15) have been deemed invalid and thirty-five (35)
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1 are under review. The current estimated amount for each California Statutory Cash Payment is
2 \$100.00.

3 c. Residual Cash Payment. Of the ten thousand nine hundred twenty-five
4 (10,925) Claim Forms submitted and processed to date, ten thousand five hundred seventy-five
5 (10,575) claimed a Residual Cash Payment. As of the date of this declaration, ten thousand four
6 hundred fifty-two (10,452) claims for a Residual Cash Payment are approved, seventeen (17)
7 have been deemed deficient and one hundred five (105) have been deemed invalid. The current
8 estimated amount for each Residual Cash Payment is \$180.99.

9 d. Credit Monitoring. Of the ten thousand nine hundred twenty-five (10,925)
10 Claim Forms submitted and processed to date, two thousand seven hundred seventy-three (2,773)
11 claimed Credit Monitoring. As of the date of this declaration, two thousand seven hundred forty-
12 eight (2,748) claims for Credit Monitoring are approved, thirteen (13) are deficient and twelve
13 (12) have been deemed invalid.

14 24. Notices of Deficiency have been or will be sent out to all those Settlement Class
15 Members whose Claim Forms are deemed deficient, providing them with an opportunity to cure
16 their Claim Forms.

17 25. The deadline to postmark or submit a Claim Form online is today, January 22, 2026.
18 The Claims Process is proceeding as anticipated, and the number of Claims is expected to
19 increase as Claim Forms that were postmarked by today are delivered to CPT.

20 26. As of the date of this declaration, the current claims rate is approximately 6.54%,
21 which is consistent with data breach class action settlements CPT has administered.

22 **REQUESTS FOR EXCLUSION & OBJECTIONS**

23 27. The deadline for Class Members to file and serve a written Objection was January
24 7, 2026. The deadline for Class Members to exclude themselves from the Settlement Class is
25 February 3, 2026.

26 28. As of the date of this declaration, CPT has received no objections.

27 29. As of the date of this declaration, CPT has received two (2) Requests for Exclusion.
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ADMINISTRATION FEES

30. If the Court grants final approval of the Settlement, CPT will handle further steps of settlement administration in accordance with the Settlement Agreement and the Court’s Order.

31. CPT’s costs for the notice and settlement administration of this matter are \$219,500.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 22nd day of January 2026, at Irvine, California.



Kaylie O'Connor

EXHIBIT A

To: [Class Member Email]

From: PLSettlement@cptgroup.com

Subject: Notice of Class Action Settlement – In re Progressive Leasing Breach Litigation

Body of Email:

Unique ID: <<ID>>
Passcode: <<Passcode>>

United States District Court for the District of Utah
In re Progressive Leasing Breach Litigation
Case No. 2:23-cv-00783

A federal court has authorized this Notice. This is not a solicitation from a lawyer.

If your Private Information was potentially involved in a Data Incident that took place at Prog Leasing, LLC on or around September 11, 2023, you could receive benefits from a class action Settlement.

Why did I Receive this Notice? You received this Notice because Prog Leasing, LLC’s (“Prog” or “Defendant”) records show that your Private Information was potentially involved in a Data Incident that took place at Prog on or around September 11, 2023 and was announced on or around September 21, 2023, (“Data Incident”). You are being provided this Notice because you have a right to know about a proposed settlement of this class action, and about your rights and options, before the Court decides whether to grant final approval of the Settlement.

How do I know if I am part of the Settlement? If you received this Notice, Defendant’s records indicate that you are included in the Settlement Class. “Settlement Class” or “Settlement Class Members” means all living individuals residing in the United States who were sent a Notice of Data Incident from Prog indicating their Private Information may have been involved in the Data Incident.

What Does the Settlement Provide? The Settlement establishes a \$3,250,000 Settlement Fund to be used to pay valid Claims; Settlement Administration Costs; Attorneys’ Fee Award and Costs and Service Awards. Settlement Class Members that submit a valid and timely Claim Form may select one or more of the following settlement benefits:

- a. **Documented Losses** – Reimbursement for certain losses that more likely than not resulted from the Data Incident up to \$5,000 per individual. You must provide documentation of losses.
- b. **California Statutory Payment** – If you resided in California at the time of the Data Incident, you may elect to receive a statutory cash payment of up to \$100. You must provide documentation of your residence in California.
- c. **Residual Cash Payment** – In the alternative to making Claims for Documented Losses and/or Claims for a California Statutory Payment, you may elect to receive a pro rata Cash Payment of up to \$400.
- d. **Credit Monitoring** – You may claim (2) two years of three bureau Credit Monitoring services.

How To Get Benefits. The only way to receive the above benefits is to submit a Claim Form by January 22, 2026. To submit a Claim Form online, click on Submit Claim and enter your Unique ID <<ID>> and Passcode <<Passcode>>.

SUBMIT CLAIM

What are my Legal Rights and Options?

- **Submit a Claim Form by January 22, 2026:** To submit an online claim, use the Submit Claim button above. If you prefer to mail in a Claim Form, a downloadable paper version is available at www.PLSettlement.com.
- **Exclude Yourself by February 3, 2026:** If you ask to be excluded, you will not receive any settlement benefits, but you may be able to file your own individual lawsuit against Defendant for the same claims. This is the only option that leaves you the right to file your own lawsuit against Defendant for the claims that are being resolved by the Settlement.
- **Object by January 7, 2026:** You can remain in the Settlement Class and file an objection telling the Court why you do not like the Settlement. If your objections are overruled, you will be bound by the Settlement.
- **Do Nothing:** You will not receive any settlement benefits. You will also remain in the Settlement Class and forfeit your right to sue or bring any claim against Defendant related to the Data Incident.

The Court will hold a Final Approval Hearing at 10:30 a.m. on February 6, 2026. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate and decide whether to approve the Settlement, Class Counsel's application for Attorneys' Fees Award and Costs and Service Awards to the Class Representatives. If there are objections, the Court will consider them.

This notice is a summary. The Settlement Agreement and more information about the lawsuit and Settlement are available at www.PLSettlement.com. If you have questions, contact the Settlement Administrator toll-free at 1-888-453-0434 or by email at PLSettlement@cptgroup.com.

EXHIBIT B

A Settlement has been reached in a class action lawsuit against Prog Leasing, LLC (“Prog”) alleging an unauthorized user gained access to Prog’s systems on or around September 11, 2023 (the “Data Incident”).

Who is Included? All living individuals residing in the United States who were sent a Notice of Data Incident from Prog indicating their Private Information may have been involved in the Data Incident.

What does the Settlement Provide? The Settlement establishes a \$3,250,000 Settlement Fund to be used to pay valid Claims; Settlement Administration Costs; Attorneys’ Fee Award and Costs and Service Awards. Settlement Class Members that submit a valid and timely Claim Form may select one or more of the following settlement benefits:

- a. **Documented Losses** – Reimbursement for certain losses that more likely than not resulted from the Data Incident up to \$5,000 per individual. You must provide documentation of losses.
- b. **California Statutory Payment** – If you resided in California at the time of the Data Incident, you may elect to receive a statutory cash payment of up to \$100. You must provide documentation of your residence in California.
- c. **Residual Cash Payment** – In the alternative to making Claims for Documented Losses and/or a Claim for a California Statutory Payment, you may elect to receive a pro rata Cash Payment of up to \$400.
- d. **Credit Monitoring** – You may claim (2) two years of three bureau Credit Monitoring services.

How To Get Benefits. You must complete and file a Claim Form online or by mail postmarked by **January 22, 2026**, including required documentation. You can file your claim online at www.PLSettlement.com using the Unique ID and Passcode located on the front of this postcard or download and submit by mail. You may also complete the enclosed tear-off Claim Form for Residual Cash Payment and Credit Monitoring *only*. Documented Losses and California Statutory Payment claims must be submitted on the website or by mail, as supporting documentation is required.

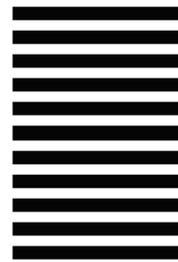
Your Other Options. If you do not want to be legally bound by the Settlement, you must **exclude yourself by February 3, 2026**. If you do not exclude yourself, you will release any claims you may have against Prog and Released Parties related to the Data Incident, as more fully described in the Settlement Agreement, available at www.PLSettlement.com. If you do not exclude yourself, you may **object to the Settlement**. Visit the website for complete information on how to exclude yourself or object to the Settlement.

The Final Fairness Hearing. The Court has scheduled a hearing in this case for **February 6, 2026 at 10:30 a.m.** located at the United States District Court for the District of Utah located at 351 S W Temple St, Salt Lake City, UT 84101, to consider whether to approve the Settlement, Service Awards, Attorneys’ Fees Award and Costs, as well as any objections. You or your attorney may attend and ask to appear at the hearing, but you are not required to do so.

This Notice is a Summary. For more information about the Settlement and how to file a Claim Form visit www.PLSettlement.com, call 1-888-453-0434 or email PLSettlement@cptgroup.com.



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES



BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. 84 IRVINE, CA

POSTAGE WILL BE PAID BY ADDRESSEE

CLASS ACTION ADMINISTRATORS
CPT GROUP INC
PO BOX 19504
IRVINE CA 92623-9902



PRESORTED
First Class
U.S. Postage
PAID

Court Approved Legal Notice

United States District Court for the
District of Utah
In re Progressive Leasing Breach Litigation
Case No. 2:23-cv-00783

**If your Private Information was potentially
involved in a Data Incident
that took place at Prog Leasing, LLC on or
around September 11, 2023 and announced
on or around September 21, 2023,
you could receive benefits from a class action
Settlement.**

*A federal court has authorized this Notice.
This is not a solicitation from a lawyer.*

Progressive Leasing Breach Litigation
c/o CPT Group, Inc.
P.O. Box 19504
Irvine, CA 92623

ELECTRONIC SERVICE REQUESTED

Unique ID: «ID»
Passcode: «Passcode»
«FullName»
«Address1» «Address2»
«City», «State» «Zip»

In re Progressive Leasing Breach Litigation, Case No. 2:23-cv-00783
POSTCARD CLAIM FORM

Complete and return this Claim Form to receive Residual Cash Payment and/or Credit Monitoring by no later than January 22, 2026. To submit a claim for Documented Losses and/or California Statutory Payment, visit the settlement website at www.PLSettlement.com.

Residual Cash Payment

Check this box if you want to receive a Residual Cash Payment. This cash payment is offered as an alternative to submitting claims for Documented Losses and/or California Statutory Payment which require documentation.

Credit Monitoring

Check this box if you want to receive 2 years of Credit Monitoring services. You must provide your email address to receive enrollment instructions: _____

Payment A paper check will be sent to the same address as this Notice. If you prefer an electronic payment such as PayPal, Venmo or Direct Deposit, file your claim at www.PLSettlement.com.

Address Change If your address is different from the preprinted data on the front of this postcard, please print your correct information. Address: _____ City: _____ State: _____ Zip: _____

Sign and Date Your Claim Form By signing my name below, I declare under penalty of perjury under the laws of the State of Utah that the information included on this Claim Form for a Residual Cash Payment and/or Credit Monitoring is true and accurate, and I certify that I am eligible to make a claim in this Settlement, and that I am completing this Claim Form to the best of my personal knowledge.

Signature: _____ Printed Name: _____ Date: _____

Email: _____ Phone Number: _____

Unique ID: «ID» / Claimant: «FullName»