

# NOTICE OF PROPOSED CLASS ACTION SETTLEMENT

*Cochrane v. People Data Labs, Inc.*

Case No. 3:25-cv-09533-RFL

United States District Court for the Northern District of California

**PEOPLE DATA LABS' RECORDS INDICATE THAT A COLORADO CELLULAR TELEPHONE NUMBER BELONGING TO YOU MAY HAVE BEEN LISTED WITHOUT YOUR PERMISSION BETWEEN SEPTEMBER 1, 2022, AND MARCH 3, 2026. A PROPOSED CLASS ACTION SETTLEMENT MAY AFFECT YOUR RIGHTS AND ENTITLE YOU TO BENEFITS AND A CASH PAYMENT.**

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

***You are not being sued.***

***Please read this Notice carefully and completely.***

- A Settlement has been reached with People Data Labs, Inc. ("PDL" or "Defendant") in a class action lawsuit. In this lawsuit the Plaintiff alleges that PDL violated the Colorado Prevention of Telemarketing Fraud Act ("PTFA") by listing Colorado citizens' cellular telephone numbers in a directory without obtaining the appropriate consent, from September 1, 2022, through March 3, 2026.
- Plaintiff's allegations have not been proven. PDL denies that it did anything wrong, and the Court has not decided who is right.
- The lawsuit is called *Cochrane v. People Data Labs, Inc.*, Case No. 3:25-cv-09533-RFL. It is pending in the United States District Court for the Northern District of California (the "Litigation").
- The parties have agreed to settle the lawsuit (the "Settlement") to avoid the costs and risks, disruptions, and uncertainties of continuing the Litigation.
- PDL's records indicate that you may be a Class Member, and entitled to benefits under the Settlement.
- Your rights are affected whether you act or don't act. ***Please read this Notice carefully and completely.***

| SUMMARY OF YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | DEADLINE                  |
|-------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|
| <b>SUBMIT A CLAIM</b>                                       | <p>The only way to receive benefits or cash payments from this Settlement is by submitting a valid and timely Claim Form.</p> <p>The fastest way to submit your Claim Form is online at <a href="http://www.PDLSettlement.com">www.PDLSettlement.com</a>. If you prefer, you can download the Claim Form from the Settlement Website and mail it to the Settlement Administrator. You may also call or email the Settlement Administrator to receive a paper copy of the Claim Form.</p>                                                                                                                                                         | <b>September 29, 2026</b> |
| <b>DO NOTHING</b>                                           | Unless you opt out of the Settlement, you are automatically part of the Settlement. If you do nothing, you will not receive benefits or payments from this Settlement and you will give up the right to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement.                                                                                                                                                                                                                                                                                                       | No Deadline               |
| <b>OPT OUT OF THE SETTLEMENT</b>                            | You can choose to opt out of the Settlement and receive no benefit or payment. This option allows you to sue, continue to sue, or be part of another lawsuit against the Defendant related to the legal claims resolved by this Settlement. You can hire your own lawyer at your own expense.                                                                                                                                                                                                                                                                                                                                                    | <b>September 29, 2026</b> |
| <b>OBJECT TO THE SETTLEMENT AND/OR ATTEND A HEARING</b>     | If you do not opt out of the Settlement, you may object to it by writing to the Court about why you don't like the Settlement. You may also ask the Court for permission to speak about your objection at the Final Approval Hearing. If you object, you may also file a claim for Settlement benefits.                                                                                                                                                                                                                                                                                                                                          | <b>September 29, 2026</b> |
| <b>GO TO A HEARING</b>                                      | You can ask to speak in Court about the fairness of the Settlement, at your own expense. See <b>Question 18</b> for more details. The Final Approval Hearing is scheduled for <b>November 17, 2026</b> , at <b>10:00 a.m. PT</b> . You may also attend the hearing via the Zoom (see the Public Hearings link and instructions at <a href="https://cand.uscourts.gov/judges/lin-rita-f-rfl/">https://cand.uscourts.gov/judges/lin-rita-f-rfl/</a> ). The hearing date may change without further notice to the class. Class members should check the settlement website or the Court's PACER site to confirm that the date has not been changed. |                           |

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- The Court in charge of this case still has to decide whether to approve the Settlement.

## WHAT THIS NOTICE CONTAINS

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## Basic Information

### 1. Why was this Notice issued?

The United States District Court for the Northern District of California, authorized this Notice. You have a right to know about the proposed Settlement of this class action lawsuit, and about all of your options, before the Court decides whether to grant final approval of the Settlement. This Notice explains the lawsuit, your legal rights, what benefits are available, and who can receive them.

The lawsuit is called *Cochrane v. People Data Labs, Inc.*, Case No. 3:25-cv-09533-RFL. It is pending in the United States District Court for the Northern District of California. The person that filed this lawsuit is called the “Plaintiff” (or “Class Representative”) and the company they sued, People Data Labs, Inc., is called the “Defendant.”

### 2. What is this lawsuit about?

This lawsuit alleges that PDL violated the Colorado Prevention of Telemarketing Fraud Act (“PTFA”) by listing Colorado citizens’ cellular telephone numbers in a directory without obtaining the appropriate consent, from September 1, 2022, through March 3, 2026.

### 3. What is a class action?

In a class action, one or more individuals sue on behalf of other people with similar claims. These individuals are called the “Plaintiffs” or “Class Representatives.” Together, the people included in the class action are called a “Class” or “Class Members.” One court resolves the lawsuit for all Class Members, except for those who opt out from the settlement. In this Settlement, the Class Representative is Janelle Cochrane. Everyone included in this Action are the Class Members.

### 4. Why is there a Settlement?

The Court did not decide whether the Plaintiff or the Defendant are right. Both sides have agreed to a Settlement to avoid the costs and risks of a trial, and to allow the Class Members to receive benefits from the Settlement. The Plaintiff and their attorneys think the Settlement is best for all Class Members.

## Who is in the Settlement?

### 5. Who is included in the Settlement?

The court has defined the Class this way: “All individuals in People Data Labs’ database with an (1) inferred mobile number as determined by the information available in Defendant’s records, (2) a Colorado area code, (3) an inferred Colorado location (current or historical), (4) whose data was sourced on or after September 2022, and (5) whose information was disclosed at least once from September 2022 to March 3, 2026.”

### 6. Are there exceptions to being included?

Yes. Excluded from the Class are: (1) the Judge in this case, and the Judge’s family and staff; (2) PDL and its officers, directors, and related companies; and (3) anyone who validly excludes themselves from the Settlement.

If you are not sure whether you are a Class Member, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: [info@PDLSettlement.com](mailto:info@PDLSettlement.com)
- Call toll free, 24/7: (833) 421-7342
- By mail: PDL PTFA Settlement  
c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799-9958

You may also view the Settlement Agreement at [www.PDLSettlement.com](http://www.PDLSettlement.com)

## The Settlement Benefits

### 7. What does the Settlement provide?

PDL will establish a Settlement Fund of \$6,362,167.00. After deduction of costs of notice and settlement administration, any award of attorneys’ fees, litigation costs, and any Service Award for the Class Representative, the remaining Settlement Fund money will be divided equally between everyone who files a valid and timely claim. The specific payment you receive will depend on how many other Class Members file valid and timely claims.

If you have questions about how this works, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: [info@PDLSettlement.com](mailto:info@PDLSettlement.com)
- Call toll free, 24/7: (833) 421-7342
- By mail: PDL PTFA Settlement  
c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799-9958

### 8. What claims am I releasing if I stay in the Class?

If you stay in the class, you won’t be able to sue, continue to sue, or otherwise be part of any other lawsuit against PDL about the issues that this Settlement covers. The “Releases” section of the Settlement Agreement (Section 3) describes the legal claims that you give up if you remain in the Class. The Settlement Agreement is available at [www.PDLSettlement.com](http://www.PDLSettlement.com)

## Submitting a Claim Form for a Settlement Payment

### 9. How do I submit a claim for a Settlement benefit?

The fastest way to submit your Claim Form is online at [www.PDLSettlement.com](http://www.PDLSettlement.com). If you prefer, you can download a printable Claim Form from the website and mail it to the Settlement Administrator at:

PDL PTFA Settlement  
c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799-9958

You may also contact the Settlement Administrator to request a Claim Form by telephone, toll free, (833) 421-7342, by email at [info@PDLSettlement.com](mailto:info@PDLSettlement.com), or by U.S. mail at the address above.

### 10. Are there any important Settlement payment deadlines?

If you are submitting a Claim Form online, you must do so by **September 29, 2026**. If you are submitting a claim by U.S. mail, the completed and signed Claim Form, including supporting documentation, must be postmarked no later than **September 29, 2026**.

### 11. When will the Settlement benefits be issued?

The Court will hold a final approval hearing on **November 17, 2026 (see Question 18)**. The hearing date may change without further notice to the class. Please be advised to check the Settlement website at [www.PDLSettlement.com](http://www.PDLSettlement.com) or the Court's PACER site detailed below to confirm that the date has not been changed. If the Court approves the Settlement, there may be appeals. We do not know if appeals will be filed, or how long it will take to resolve them if they are filed.

Settlement payments will be distributed if the Court grants final approval, and after any appeals are resolved.

## The Lawyers Representing You

### 12. Do I have a lawyer in the case?

Yes, the Court has appointed attorneys Joseph I. Marchese, Daniel S. Guerra, and Matthew A. Girardi of Bursor & Fisher, P.A., to represent you and other Class Members ("Class Counsel"). You may contact Class Counsel to answer any questions you may have.

**BURSOR & FISHER, P.A.**  
1330 Avenue of the Americas, 32nd Floor  
New York, NY 10019  
Telephone: (646) 837-7150  
Fax: (212) 989-9163  
Email: [info@bursor.com](mailto:info@bursor.com)

### 13. Should I get my own lawyer?

You will not be charged for Class Counsel's services. If you want your own lawyer, you may hire one at your expense.

## 14. How will Class Counsel be paid?

Class Counsel will ask the court to approve up to one-third of the Settlement Fund as reasonable attorneys' fees and reimbursement of litigation costs. This amount will be paid from the Settlement Fund.

Class Counsel will also ask for a Service Award Payment of \$5,000.00 for the Class Representative. The Service Award Payment will be determined by the Court and will also be paid from the Settlement Fund.

## Excluding Yourself from the Settlement

### 15. How do I opt out of the Settlement?

If you do not want to be part of the Settlement, you must formally exclude yourself from the Settlement. This is called a Request for Exclusion, and is sometimes also called "opting out." If you opt out, you will not receive Settlement benefits or payment. However, you will keep any rights you may have to sue PDL on your own about the legal issues in this case.

If you exclude yourself, you are telling the Court that you do not want to be part of the Settlement. You will not be eligible to receive any Settlement benefits if you exclude yourself.

The deadline to exclude yourself from the Settlement is **September 29, 2026**.

To be valid, your Request for Exclusion must have the following information:

- (1) the name of the Litigation: *Cochrane v. People Data Labs, Inc.*, Case No. 3:25-cv-09533-RFL, pending in the United States District Court for the Northern District of California;
- (2) your full name, mailing address, telephone number, and email address;
- (3) personal signature; and
- (4) the words "Request for Exclusion" or a clear and similar statement that you do not want to participate in the Settlement.

You may only exclude yourself—not any other person.

Mail your Request for Exclusion to the Settlement Administrator at:

PDL PTFA Settlement  
ATTN: Exclusion Request  
P.O. Box 25226  
Santa Ana, CA 92799-9958

Your Request for Exclusion must be submitted, postmarked, or emailed by **September 29, 2026**.

## Commenting on or Objecting to the Settlement

### 16. How do I tell the Court if I like or do not like the Settlement?

If you are a Class Member and do not like part or all of the Settlement, you can object to it. Objecting means telling the Court your reasons for why you think the Court should not approve the Settlement. The Court will consider your views.

You can ask the Court to deny approval by filing an objection. You can't ask the Court to order a different settlement; the Court can only approve or reject the settlement. If the Court denies approval, no settlement payments will be sent out, and the lawsuit will continue. If that is what you want to happen, you should object.

You cannot object if you have excluded yourself from the Settlement (**see Question 15**)

You must provide the following information for the Court to consider your objection:

- (1) the name of the Litigation: *Cochrane v. People Data Labs, Inc.*, Case No. 3:25-cv-09533-RFL, pending in the United States District Court for the Northern District of California;
- (2) your full name, mailing address, telephone number, and email address;
- (3) information that proves that you are a Class Member, including an attestation that you owned the cellular telephone number associated with you in PDL's records between September 1, 2022, and March 3, 2026;
- (4) a clear description of all the reasons you object; include any legal support, such as documents, you may have for your objection;
- (5) if you have hired your own lawyer to represent you for this objection, provide their name, bar number, and contact information;
- (6) if you or your lawyer have objected in any other cases and asked for or received any payment in exchange for dismissing your objection or related appeal, without any modification to the settlement, list the names, courts, the orders ruling on your objections, and civil action numbers for each of those cases;
- (7) if you plan on calling witnesses or submitting documents at the Final Approval Hearing, provide a full list of both;
- (8) your signature (if you have hired your own lawyer, their signature is not sufficient).

Any objection to the proposed settlement must be in writing. If you file a timely written objection, you may, but are not required to, appear at the Final Approval Hearing, either in person or through your own attorney. If you appear through your own attorney, you are responsible for hiring and paying that attorney. All written objections and supporting papers must (a) clearly identify the case name and number ( *Cochrane v. People Data Labs, Inc.*, Case No. 3:25-cv-09533-RFL), (b) be submitted to the Court either by filing them electronically or in person at any location of the United States District Court for the Northern District of California or by mailing them to the Clerk of the Court as detailed below, and (c) be filed or postmarked on or before **September 29, 2026**.

For your objection to be valid, it must substantially meet each of these requirements. These requirements may be excused upon a showing of good cause.

To be considered by the Court, you must file your complete objection with the Clerk of Court by **September 29, 2026**. You must also send a copy of the objection to the Settlement Administrator.

| Clerk of the Court                                                                                                                 | Settlement Administrator                                                              |
|------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| Clerk of the Court<br>Phillip Burton Federal Building<br>450 Golden Gate Avenue, 16 <sup>th</sup> Floor<br>San Francisco, CA 94102 | PDL PTFA Settlement<br>ATTN: Objections<br>P.O. Box 25226<br>Santa Ana, CA 92799-9958 |

## 17. What is the difference between objecting and excluding?

Objecting is telling the Court that you do not like something about the Settlement. You can object to the Settlement only if you do not exclude yourself from the Settlement. Excluding yourself from the Settlement is opting out and stating to the Court that you do not want to be part of the Settlement. If you opt out of the Settlement, you cannot object to it because the Settlement no longer affects you.

## The Court's Final Approval Hearing

### 18. When is the Court's Final Approval Hearing?

The Court will hold a final approval hearing on **November 17, 2026 at 10:00 am Pacific Time**, in the United States District Court for the Northern District of California, at 450 Golden Gate Avenue, Courtroom 4, 17th Floor, San Francisco, California 94102. You may also attend the hearing via the Zoom (see the Public Hearings link and instructions at <https://cand.uscourts.gov/judges/lin-rita-f-rfl/>).

At the final approval hearing, the Court will decide whether to approve the Settlement. The court will also decide how Class Counsel should be paid, and whether to award a Service Award Payment to the Class Representative. The Court will also consider any objections to the Settlement.

If you are a Class Member, you or your lawyer may ask permission to speak at the hearing at your own cost (**See Question 16**). Upon a showing of good cause to the Court, any objecting Class Member may appear, in person or by counsel, at the Final Approval Hearing held by the Court.

The Court may reschedule the Final Approval Hearing or change any of the deadlines described in this Notice. The date of the Final Approval Hearing may change without further notice to Class Members. Be sure to check the website, [www.PDLSettlement.com](http://www.PDLSettlement.com) for news of any such changes. You can also access the case docket via the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>.

### 19. Do I have to come to the Final Approval Hearing?

No. Class Counsel will answer any questions the Court may have. You may attend at your own expense if you wish, but you do not have to.

If you file an objection, you do not have to come to the Final Approval Hearing to talk about it; absent good cause, the Court will consider it as long as it was filed on time. You may also pay your own lawyer to attend, but you do not have to.

## If I Do Nothing

### 20. What happens if I do nothing at all?

If you do nothing, you will not receive a benefit from this Settlement.

You will also give up the rights described in **Question 8**.

## Getting More Information

### 21. How do I get more information?

This Notice is a summary of the proposed Settlement. The full Settlement Agreement and other related documents are available at the Settlement Website, [www.PDLSettlement.com](http://www.PDLSettlement.com).

If you have additional questions, you can ask for free help any time by contacting the Settlement Administrator at:

- Email: [info@PDLSettlement.com](mailto:info@PDLSettlement.com)
- Call toll free, 24/7: (833) 421-7342
- By mail: PDL PTFA Settlement  
c/o Settlement Administrator  
P.O. Box 25226  
Santa Ana, CA 92799-9958

This notice summarizes the proposed settlement. For the precise terms of the settlement, please see the settlement agreement available at [www.PDLSettlement.com](http://www.PDLSettlement.com), by contacting Class Counsel (see **Question 12**), by accessing the Court docket in this case, for a fee, through the Court's Public Access to Court Electronic Records (PACER) system at <https://ecf.cand.uscourts.gov>, or by visiting the office of the Clerk of the Court for the United States District Court for the Northern District of California at any of the Court's locations between 9:00 a.m. and 4:00 p.m., Monday through Friday, excluding Court holidays.

**PLEASE DO NOT CONTACT THE COURT OR COURT CLERK'S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS**