

SUPERIOR COURT OF WASHINGTON IN AND FOR KING COUNTY

In re FUNKO, INC. SECURITIES  
LITIGATION

This Document Relates To:

ALL ACTIONS.

) Case No. 17-2-29838-7 SEA  
) (Consol. with Nos. 18-2-01264-3 SEA, 18-2-  
) 01582-1 SEA, 18-2-02535-4 SEA, 18-2-  
) 08153-0 SEA, 18-2-12229-5 SEA, and 18-2-  
) 14811-1 SEA).

) CLASS ACTION

) SUPPLEMENTAL DECLARATION OF  
) ANN CAVANAUGH REGARDING  
) NOTICE DISSEMINATION,  
) PUBLICATION, AND REQUESTS FOR  
) EXCLUSION RECEIVED TO DATE

1 I, Ann Cavanaugh, declare and state as follows:

2 1. I am a Project Manager at A.B. Data, Ltd. ("A.B. Data"). The following statements  
3 are based on my personal knowledge and information provided to me by other A.B. Data  
4 employees and, if called to testify, I could and would do so competently.

5 2. Pursuant to this Court's February 12, 2025 Order Preliminarily Approving  
6 Settlement and Providing for Notice ("Preliminary Approval Order"), A.B. Data was appointed  
7 as the Claims Administrator to supervise and administer the notice procedure, as well as the  
8 processing of claims in connection with the proposed Settlement of the above-captioned action.<sup>1</sup>  
9 I oversaw the notice services that A.B. Data provided in accordance with the Preliminary  
10 Approval Order.

11 3. I submit this declaration as a supplement to my earlier declaration, the Declaration  
12 of Ann Cavanaugh Regarding Notice Dissemination, Publication, and Requests for Exclusion  
13 Received to Date, dated May 1, 2025 and filed on May 2, 2025 (the "Initial Cavanaugh  
14 Declaration").

15 **UPDATE REGARDING DISSEMINATION OF THE CLAIM PACKAGE**

16 4. As stated in the Initial Cavanaugh Declaration, as of May 1, 2025, A.B. Data had  
17 mailed 16,215 copies of the Court-approved Notice of Pendency of Class Action, Proposed  
18 Settlement, and Motion for Attorneys' Fees and Expenses (the "Notice") and the Proof of Claim  
19 and Release Form (the "Proof of Claim") (collectively, the "Claim Package") to potential Class  
20 Members and their nominees. *See* Initial Cavanaugh Declaration, ¶12. Since then, A.B. Data has  
21 mailed an additional 31 Claim Packages in response to requests. Accordingly, as of the close of  
22 business on May 29, 2025, an aggregate of 16,246 Claim Packages have been disseminated to  
23 potential Class Members and their nominees by first-class mail.

24  
25  
26 <sup>1</sup> Unless otherwise defined herein, all capitalized terms shall have the same meanings as set  
forth in the Stipulation of Settlement (the "Stipulation"), dated February 7, 2025.

## UPDATE TO THE SETTLEMENT WEBSITE

5. As reported in the Initial Cavanaugh Declaration, a website dedicated to this action (www.FunkoSecuritiesSettlement.com) was established on March 4, 2025. *See id.*, ¶15. Following the Court's Preliminary Approval Order, A.B. Data updated the website with information regarding the proposed Settlement, including important dates and deadlines and Settlement-related documents. *Id.* The website since has been updated again to include all documents filed in support of final approval, including: Class Representatives' Motion for Final Approval of Settlement and Approval of Plan of Allocation of Settlement Proceeds; Class Representatives' Motion for an Award of Attorneys' Fees and Expenses and Reimbursement for Class Representatives' Time; the Notices of each Motion; the Declaration of James I. Jaconette in Support of: (1) Class Representatives' Motion for Final Approval of Settlement and Approval of Plan of Allocation; and (2) Class Representatives' Counsel's Motion for an Award of Attorneys' Fees and Expenses and Award to Class Representatives/Plaintiffs; the Initial Cavanaugh Declaration; and Class Representatives' Counsel's respective declarations in support of application for award of attorneys' fees and expenses.

## EXCLUSION REQUESTS

6. The Notice informed potential Class Members that requests for exclusion (or "opt-out requests") from the Class had to be mailed to *Funko Securities Settlement*, ATTN: EXCLUSIONS, c/o A.B. Data, Ltd., P.O. Box 173001, Milwaukee, WI 53217, such that they are received no later than May 16, 2025. The Notice also set forth the information that should be included in each request for exclusion. The deadline for submitting requests for exclusion was May 16, 2025.

7. As of May 29, 2025, A.B. Data has received **zero (0)** requests for exclusion – regardless of whether they were timely received.

8. Additionally, while the Notice informed potential Class Members that objections must be filed with the Court and that the objector must also serve the objections on Class

1 Representatives' Counsel and Defendants' Counsel such that they are received no later than May  
2 16, 2025, as stated in the Initial Cavanaugh Declaration (§§17-18), A.B. Data has monitored all  
3 mail delivered to A.B. Data's Settlement-specific P.O. Boxes. As of May 29, 2025, A.B. Data  
4 has received **zero (0)** objections – regardless of whether they were timely received.

5 I declare under penalty of perjury under the laws of the State of Washington that the  
6 foregoing is true and correct.

7 Executed on this 29th day of May, 2025, at Milwaukee, Wisconsin.

8   
9  
10 Ann Cavanaugh