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Capitol Records, Inc., UMG Recordings, Inc. BMG Music, Recording Industry Association
of America, Settlement Support Center, LLC, and SafeNet, Inc., f/k/a Media Sentry, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

TANYA ANDERSEN,

Civil No. 3:07-CV-934-BR

Plaintiff,

v.

**DECLARATION OF KATHERYN J.
COGGON**

**ATLANTIC RECORDING
CORPORATION, et al.,**

Defendants.

I, Katheryn J. Coggon, declare and testify as follows:

PAGE 1 - DECLARATION OF KATHERYN J. COGGON

1. I am an attorney at the law firm of Holme Roberts & Owen LLP, counsel to Defendants Atlantic Recording Corporation, Priority Records, LLC, Capitol Records, Inc., UMG Recordings, Inc., BMG Music, Recording Industry Association of America, and Settlement Support Center, LLC in this matter. I make the following statements in this declaration based upon my personal knowledge and I am competent to testify regarding any matters set forth herein.

2. My firm and prior counsel to Defendants, in conjunction with the agents we have engaged to communicate with persons whom the Defendants believe infringed their copyrights, have maintained a database in which attorneys or settlement agents record their thoughts and mental impressions about their exchanges with the persons against whom Defendants contemplated or were engaged in litigation.

3. As agreed between the parties to this case, Defendants' counsel reviewed all of the entries in the database pertaining to the roughly 100 residents of Oregon against whom Defendants contemplated or were engaged in litigation (hereafter the "Sample Population"). A very small quantity of entries in the database—less than three percent—are actual or exactly-transcribed written communications with the Sample Population (i.e., electronic mail messages to or from members of the Sample Population or transcriptions of letters to or from members of the Sample Population). The production accompanying this declaration contains all such communications.

4. To the extent that the other entries in the database reflect communications with members of the Sample Population, the memorializations of these communications reflect the subjective mental impressions of the attorney or settlement agent who had the communication. Defendants assert that these entries are protected by the attorney work product immunity.

5. The rest of the database entries reflect exchanges between attorneys and settlement agents concerning how to respond to inquiries from members of the Sample Population. Defendants' counsel assert that these communications entries are protected from

disclosure by the work product doctrine and, to the extent they also reflect instructions from Defendants themselves, they are additionally protected from disclosure by the attorney-client privilege.

6. Pursuant to this Court's rulings on the privilege and work product issues before it on February 9, 2009, Defendants are providing Plaintiff with the facts respecting Defendants' exchanges with members of the Sample Population, without revealing communications between Defendants and their counsel or the mental impressions of Defendants' counsel.

7. Exhibit A, attached hereto, provides a factual summary of the exchanges with members of the Sample Population that are reflected in the database. It has been revised from the version of Exhibit A accompanying the Declaration of Katheryn Coggon, dated February 23, 2009, to replace the names of Oregon residents with numerical substitutes (i.e. "Oregon Resident No. 1," etc.). Paragraphs 33 and 53 have also been revised to reflect the fact that these individuals have since settled with Defendants.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 12th day of June, 2009 at Portland, Oregon.

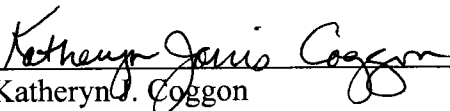

Katheryn J. Coggon

Exhibit A

1. No. 109044738, Oregon Resident Number 1 (“OR No. 1”). OR No. 1 contacted Defendants and stated that another person, Oregon Resident Number 2 (“OR No. 2”), was responsible for using the computer to upload and download copies of copyrighted sound recordings, and provided an affidavit to that effect. Upon receiving OR No. 1’s affidavit, Defendants discontinued proceedings against OR No. 1 and initiated proceedings against OR No. 2.
2. No. 109044738A, Oregon Resident Number 2 (“OR No. 2”). OR No. 2 contacted Defendants and, after negotiation, orally agreed to settle Defendants’ claims against him for \$4,750. However, OR No. 2 failed to submit an executed settlement agreement, and Defendants ultimately obtained a default judgment against him in the amount of \$7,000.
3. No. 1133586, Oregon Resident Number 3 (“OR No. 3”). OR No. 3 contacted Defendants and, after negotiation, agreed to settle Defendants’ claims against him for a payment of \$3,000.
4. No. 1157895, Oregon Resident Number 4 (“OR No. 4”). OR No. 4’s attorney contacted Defendants and, after negotiation, agreed to settle Defendants’ claims against OR No. 4 for a payment of \$3,500.
5. No. 11753639A, Oregon Resident Number 5 (“OR No. 5”). OR No. 5 contacted Defendants, stated that her computer was used to upload and download copies of copyrighted sound recordings by her roommate, Oregon Resident Number 6 (“OR No. 6”) and provided an affidavit to that effect. Upon receiving OR No. 5’s affidavit, Defendants discontinued proceedings against OR No. 5 and initiated proceedings against OR No. 6.
6. No. 11753639, Oregon Resident Number 6 (“OR No. 6”). OR No. 6 contacted Defendants and, after negotiation, agreed to settle Defendants’ claims against her for a payment of \$2,000.
7. No. 119395206, Oregon Resident Number 7 (“OR No. 7”). OR No. 7 contacted Defendants and stated that she was not responsible for using the computer to upload or download copies of copyrighted sound recordings. Through her attorney, OR No. 7 indicated that she did not want to settle Defendants’ claims against her, after which the Defendants proceeded with litigation in the form of a Doe suit and have sought leave to depose OR No. 7 and examine her computer in order to determine the identities of the Doe defendant(s).

8. No. 119399613, Oregon Resident Number 8 (“OR No. 8”). Unresolved.
9. No. 120886695, Oregon Residents Numbers 9 and 10 (“OR No. 9 and OR No. 10”). OR No. 10 contacted Defendants and stated that her minor son had used the computer to upload and download copies of copyrighted sound recordings. After negotiation, OR No. 9 and OR No. 10 agreed to settle Defendants’ claims against them for a payment of \$5,250.
10. No. 121131057, Oregon Resident Number 11 (“OR No. 11”). OR No. 11 contacted Defendants and agreed to settle Defendants’ claims against her for a payment of \$5,600.
11. No. 121327800, Oregon Resident Number 12 (“OR No. 12”). OR No. 12 contacted Defendants and agreed to settle Defendants’ claims against her for a payment of \$5,500.
12. No. 121589148, Oregon Resident Number 13 (“OR No. 13”). Unresolved.
13. No. 121600765, Oregon Resident Number 14 (“OR No. 14”). OR No. 14 contacted Defendants and, after negotiation, agreed to settle Defendants’ claims against him for a payment of \$5,100.
14. No. 1216172, Oregon Resident Number 15 (“OR No. 15”). OR No. 15 contacted Defendants and, after negotiation, agreed to settle Defendants’ claims against her for a payment of \$3,000.
15. No. 121748944, Oregon Resident Number 16 (“OR No. 16”). Unresolved.
16. No. 121952120, Oregon Resident Number 17 (“OR No. 17”). Unresolved.
17. No. 122635732, Oregon Resident Number 18 (“OR No. 18”). Unresolved.
18. No. 126304573, Oregon Resident Number 19 (“OR No. 19”). *Sony BMG Music Entertainment et al. v. [OR No. 19]*, Case No.08-cv-1188, D. Or. pending.
19. No. 126413916, Oregon Resident Number 20 (“OR No. 20”). OR No. 20 contacted Defendants and stated that she did not use the computer to upload or download copies of copyrighted sound recordings, and that Defendants’ conduct was not fair. After negotiation, OR No. 20 agreed to settle Defendants’ claims against her for a payment of \$5,500.
20. No. 126533780, Oregon Resident Number 21 (“OR No. 21”). Unresolved.

21. No. 126556162, Oregon Resident Number 22 (“OR No. 22”). OR No. 22’s attorney contacted Defendants and, after negotiation, agreed to settle Defendants’ claims against OR No. 22 for a payment of \$5,500.
22. No. 126562271, Oregon Resident Number 23 (“OR No. 23”). Unresolved.
23. No. 126572089, Oregon Resident Number 24 (“OR No. 24”). Unresolved.
24. No. 126757753, Oregon Resident Number 25 (“OR No. 25”). OR No. 25 contacted Defendants and, after negotiation and submission of hardship documents, agreed to settle with a stipulated injunction and no monetary payment.
25. No. 126770854, Oregon Resident Number 26 (“OR No. 26”). OR No. 26 contacted Defendants and stated that she did not use the computer to upload or download copyrighted sound recordings. OR No. 26 entered into discussions regarding settling Defendants’ claims against her but the parties were unable to reach a settlement. Subsequently, OR No. 26 could not be located, and Defendants discontinued proceedings against her.
26. No. 126806242, Oregon Resident Number 27 (“OR No. 27”). OR No. 27 contacted Defendants and, after negotiation, agreed to settle Defendants’ claims against him for a payment of \$4,350.
27. No. 127038660, Oregon Resident Number 28 (“OR No. 28”). OR No. 28 contacted Defendants and, after negotiation, agreed to settle Defendants’ claims against her for a payment of \$4,100.
28. No. 127081538, Oregon Resident Number 29 (“OR No. 29”). OR No. 29 contacted Defendants but did not engage in settlement negotiations with Defendants. Defendants ultimately filed suit against OR No. 29 and obtained a default judgment against him in the amount of \$7,920.
29. No. 127128664, Oregon Resident Number 30 (“OR No. 30”). Defendants filed suit against OR No. 30, *Sony BMG Music Entertainment et al. v. [OR No. 30]*, Case No. 3:08-CV-298-BR, but that action was stayed when OR No. 30 filed for bankruptcy protection.
30. No. 1278848, Oregon Resident Number 31 (“OR No. 31”). OR No. 31’s attorney contacted Defendants and, after negotiation, agreed to settle Defendants’ claims against OR No. 31 for a payment of \$3,000.
31. No. 128331354, Oregon Resident Number 32 (“OR No. 32”). OR No. 32 contacted Defendants and agreed to settle Defendants’ claims against her for a payment of \$5,500.

32. No. 128590133, Oregon Resident Number 33 (“OR No. 33”). OR No. 33 contacted Defendants, complained that Defendants’ actions were unfair, and agreed to settle Defendants’ claims against her for a payment of \$5,500.
33. No. 129090597, Oregon Resident Number 34 (“OR No. 34”). OR No. 34 contacted Defendants and agreed to settle Defendants’ claims against her for a payment of \$4,000.
34. No. 129398160, Oregon Resident Number 35 (“OR No. 35”). OR No. 35 contacted Defendants and agreed to settle Defendants’ claims against her for a payment of \$5,500.
35. No. 130074095, Oregon Resident Number 36 (“OR No. 36”). OR No. 36 contacted Defendants and agreed to settle Defendants’ claims against her for a payment of \$5,500.
36. No. 130126360, Oregon Resident Number 37 (“OR No. 37”). OR No. 37 could not be located and Defendants discontinued proceedings against him.
37. No. 130419917, Oregon Resident Number 38 (“OR No. 38”). OR No. 38 contacted Defendants and agreed to settle Defendants’ claims against him for a payment of \$5,500.
38. No. 1308877, Oregon Resident Number 39 (“OR No. 39”). OR No. 39 contacted Defendants and, after negotiation, agreed to settle Defendants’ claims against him for a payment of \$3,000.
39. No. 1310571, Oregon Resident Number 40 (“OR No. 40”). OR No. 40 contacted Defendants to negotiate settlement but an agreement was not reached. Defendants ultimately filed suit against OR No. 40 and obtained a default judgment against him in the amount of \$6,936.
40. No. 1311125, Oregon Residents Numbers 41 and 42 (“OR No. 41 and OR No. 42”). OR No. 42 contacted Defendants to negotiate settlement but an agreement was not reached. Defendants ultimately filed suit against OR No. 41 and OR No. 42 and obtained a default judgment against them in the amount of \$8,500.
41. No. 1333391, Oregon Resident Number 43 (“OR No. 43”). Defendants filed suit against OR No. 43, and the case proceeded to discovery. Discovery disclosed that OR No. 43’s children may have used the computer to upload and download copies of copyrighted sound recordings, and the children were added as parties. The parties agreed to settle Defendants’ claims against OR No. 43 and his family for a payment of \$6,500. The Judge denied OR No. 43 defendants’ counterclaim for attorneys’ fees.

42. No. 1333391A, Oregon Resident Number 44 ("OR No. 44"). Son of OR No. 43. Claims were settled for a payment of \$6,500. See No. 1333391, OR No. 43.
43. No. 1333391B, Oregon Resident Number 45 ("OR No. 45"). Daughter of OR No. 43. Claims were settled for a payment of \$6,500. See No. 1333391, OR No. 43.
44. No. 1333391C, Oregon Resident Number 46 ("OR No. 46"). Daughter of OR No. 43. Claims were settled for a payment of \$6,500. See No. 1333391, OR No. 43.
45. No. 134933768, Oregon Resident Number 47 ("OR No. 47"). OR No. 47 contacted Defendants and, after negotiation, agreed to settle Defendants' claims against her for a payment of \$4,000.
46. No. 1349512, Oregon Resident Number 48 ("OR No. 48"). OR No. 48's attorney contacted Defendants and, after negotiation, agreed to settle Defendants' claims against him for a payment of \$3,000.
47. No. 135659091, Oregon Resident Number 49 ("OR No. 49"). OR No. 49's attorney contacted Defendants and, after negotiation, agreed to settle Defendants' claims against him for a payment of \$4,000.
48. No. 136645194, Oregon Resident Number 50 ("OR No. 50"). OR No. 50 contacted Defendants and agreed to settle Defendants' claims against him for a payment of \$4,100.
49. No. 138039814, Oregon Resident Number 51 ("OR No. 51"). OR No. 51's attorney contacted Defendants and, after negotiation, agreed to settle Defendants' claims against her for a payment of \$5,000.
50. No. 139424283, Oregon Resident Number 52 ("OR No. 52"). OR No. 52 contacted Defendants and, after negotiation, agreed to settle Defendants' claims against her for a payment of \$4,600.
51. No. 14254821, Oregon Resident Number 53 ("OR No. 53"). OR No. 53 contacted Defendants, stated that her computer was used to upload and download copies of copyrighted sound recordings by her adult sons, Oregon Resident Number 54 ("OR No. 54") and Oregon Resident Number 55 ("OR No. 55"), and provided an affidavit to that effect, after which Defendants discontinued proceedings against OR No. 53 and initiated proceedings against OR No. 54 and OR No. 55.
52. No. 14254821A, Oregon Resident Number 54 ("OR No. 54") and Oregon Resident Number 55 ("OR No. 55"). OR No. 55 contacted Defendants and, after negotiation, OR No. 54 and OR No. 55 agreed to settle for a payment of \$3,650.

53. No. 142983806, Oregon Resident Number 56 ("OR No. 56"). OR No. 56's attorney contacted Defendants and, after negotiation, agreed to settle Defendants' claims against him for a payment of \$2,000.
54. No. 1466546, Oregon Resident Number 57 ("OR No. 57"). OR No. 57 contacted Defendants and, after negotiation, agreed to settle Defendants' claims against him for a payment of \$3,000.
55. No. 147517391, Oregon Resident Number 58 ("OR No. 58"). Unresolved.
56. No. 1578545, Oregon Resident Number 59 ("OR No. 59"). OR No. 59 moved to Mexico before Defendants commenced an action against him. Defendants thereafter discontinued proceedings against him.
57. No. 158742546, Oregon Resident Number 60 ("OR No. 60"). OR No. 60's attorney contacted Defendants and, after negotiation, agreed to settle Defendants' claims against OR No. 60 for a payment of \$4,100.
58. No. 1602184, Oregon Resident Number 61 ("OR No. 61"). OR No. 61 could not be located and Defendants discontinued proceedings against her.
59. No. 1618786, Oregon Resident Number 62 ("OR No. 62"). OR No. 62 contacted Defendants and, after negotiation, agreed to settle Defendants' claims against her for a payment of \$3,750.
60. No. 1628212, Oregon Resident Number 63 ("OR No. 63"). Defendants contacted OR No. 63, who complained that Defendants' actions were unfair. The parties were unable to reach a settlement, and Defendants obtained a default judgment against OR No. 63 in the amount of \$3,967.50.
61. No. 1662328, Oregon Resident Number 64 ("OR No. 64"). OR No. 64 filed for bankruptcy protection, and Defendants ceased the action against her.
62. No. 170044737, Oregon Resident Number 65 ("OR No. 65"). OR No. 65 contacted Defendants, stated that he had not used the computer to upload or download copies of copyrighted sound recordings, but that he was willing to submit an affidavit identifying the person who was responsible for doing so. Defendants are awaiting receipt of OR No. 65's affidavit.
63. No. 1713710, Oregon Resident Number 66 ("OR No. 66"). OR No. 66 could not be located and Defendants discontinued proceedings against her.
64. No. 171889140, Oregon Residents Numbers 67("OR No. 67") and 68 ("OR No. 68"). OR No. 67 and OR No. 68's attorney contacted Defendants and after

negotiation, agreed to settle Defendants' claims against them for a payment of \$3,750.

65. No. 172599364, Oregon Residents Numbers 69 ("OR No. 69") and 70 ("OR No. 70"). OR No. 69 and OR No. 70 contacted the Defendants and, after negotiation, settled the Defendants' claim against them for \$4,000.
66. No. 17968532, Oregon Resident Number 71 ("OR No. 71"). OR No. 71's attorney contacted Defendants and, after negotiation, agreed to settle Defendants' claims against OR No. 71 for a payment of \$2,800.
67. No. 1818536, Oregon Residents Numbers 72 ("OR No. 72") and 73 ("OR No. 73"). OR No. 72 contacted Defendants and, after negotiation, agreed to settle Defendants' claims against OR No. 72 and OR No. 73 for a payment of \$3,000.
68. No. 1992048, Oregon Residents Numbers 74 ("OR No. 74") and 75 ("OR No. 75"). OR No. 75 contacted Defendants and informed Defendants that they, OR No. 74 and OR No. 75, were misidentified. OR No. 74 and OR No. 75's ISP confirmed the misidentification, and Defendants discontinued proceedings against them.
69. No. 20693209, Oregon Resident Number 76 ("OR No. 76"). OR No. 76 contacted Defendants and agreed to settle Defendants' claims against him for a payment of \$5,000.
70. No. 21502088, Oregon Resident Number 77 ("OR No. 77"). OR No. 77 contacted Defendants and, after negotiation, agreed to settle Defendants' claims against her for a payment of \$4,800.
71. No. 2956087, Tanya Andersen. Ms. Andersen's case is the subject of the instant litigation.
72. No. 3081824, Oregon Resident Number 78 ("OR No. 78"). OR No. 78 contacted Defendants and agreed to settle Defendants' claims against her for a payment of \$4,500.
73. No. 3407160, Oregon Resident Number 79 ("OR No. 79"). OR No. 79 contacted Defendants and, after negotiation, agreed to settle Defendants' claims against him for a payment of \$4,600.
74. No. 39240257, Oregon Resident Number 80 ("OR No. 80"). Defendants obtained a default judgment against OR No. 80 in the amount of \$6,480.
75. No. 42825438, Oregon Resident Number 81 ("OR No. 81"). OR No. 81 could not be located and Defendants discontinued proceedings against her.

76. No. 48805360, Oregon Resident Number 82 ("OR No. 82"). OR No. 82 could not be located and Defendants discontinued proceedings against him.
77. No. 50626436, Oregon Resident Number 83 ("OR No. 83"). OR No. 83 contacted Defendants and agreed to settle Defendants' claims against her for a payment of \$4,250.
78. No. 52114484, Oregon Resident Number 84 ("OR No. 84"). OR No. 84 contacted Defendants and, after negotiation, agreed to settle Defendants' claims against her for a payment of \$1,000.
79. No. 64653958, Oregon Resident Number 85 ("OR No. 85"). OR No. 85's attorney contacted Defendants and agreed to settle Defendants' claims against OR No. 85 for a payment of \$4,500.
80. No. 6484503, Oregon Resident Number 86 ("OR No. 86"). OR No. 86 contacted Defendants and agreed to settle Defendants' claims against her for a payment of \$4,500.
81. No. 65722097, Oregon Resident Number 87 ("OR No. 87"). Defendants were unable to serve process on OR No. 87, and therefore discontinued proceedings against him.
82. No. 66421534, Oregon Resident Number 88 ("OR No. 88"). OR No. 88's attorney contacted Defendants and, after negotiation, agreed to settle Defendants' claims against OR No. 88 for a payment of \$4,500.
83. No. 67208943, Oregon Resident Number 89 ("OR No. 89"). OR No. 89 contacted Defendants and, after negotiation, agreed to settle Defendants' claims against her for a payment of \$2,000.
84. No. 67237865, Oregon Resident Number 90 ("OR No. 90"). Defendants initiated proceedings against Oregon Resident Number 91 ("OR No. 91"). OR No. 90, OR No. 91's daughter, contacted Defendants and stated that she was responsible for using the computer to upload and download copies of copyrighted sound recordings. She stated that OR No. 91 was not involved. Thereafter, Defendants discontinued proceedings against OR No. 91 and initiated proceedings against OR No. 90. After negotiation, OR No. 90 agreed to settle Defendants' claims against her for a payment of \$1,000.
85. No. 70948365, Oregon Resident Number 92 ("OR No. 92"). OR No. 92 contacted Defendants and stated that her computer was used to upload and download copies of copyrighted sound recordings by her son, Oregon Resident Number 93 ("OR No. 93"). Defendants discontinued proceedings against OR No.

- 92 and initiated proceedings against OR No. 93, who agreed to settle Defendants' claims against him for a payment of \$5,500.
86. No. 7861269, Oregon Resident Number 94 ("OR No. 94"). OR No. 94 contacted Defendants and, after negotiation, agreed to settle Defendants' claims against him for a payment of \$3,000.
 87. No. 86315198A, Oregon Resident Number 95 ("OR No. 95"). OR No. 95 contacted Defendants and, after negotiation, agreed to settle Defendants' claims against him for a payment of \$4,170.
 88. No. 89421755, Oregon Resident Number 96 ("OR No. 96"). OR No. 96's attorney contacted Defendants and, after negotiation, agreed to settle Defendants' claims against him for a payment of \$3,750.
 89. No. 91150949, Oregon Resident Number 97 ("OR No. 97"). OR No. 97 contacted Defendants and agreed to settle Defendants' claims against her for a payment of \$4,850.
 90. No. 91635049, Oregon Resident Number 98 ("OR No. 98"). OR No. 98 contacted Defendants and stated that her computer was used to upload and download copies of copyrighted sound recordings by her children, Oregon Resident Number 99 ("OR No. 99") and Oregon Resident Number 100 ("OR No. 100"), and OR No. 100's boyfriend, Oregon Resident Number 101 ("OR No. 101"). OR No. 98 provided an affidavit to that effect, and Defendants thereafter discontinued proceedings against OR No. 98 and initiated proceedings against OR No. 99 and OR No. 100, and OR No. 101.
 91. No. 91635049A, Oregon Resident Number 99 ("OR No. 99"). After contacting OR No. 99, Defendants filed suit against him and obtained a default judgment against him and his co-defendants in the amount of \$8,730.
 92. No. 91635049B, Oregon Resident Number 100 ("OR No. 100"). After contacting OR No. 100, Defendants filed suit against her and obtained a default judgment against her and her co-defendants in the amount of \$8,730.
 93. No. 91635049C, Oregon Resident Number 101 ("OR No. 101"). After several attempts to contact OR No. 101, Defendants filed suit against him and obtained a default judgment against him and his co-defendants in the amount of \$8,730.
 94. No. 92027357, Oregon Resident Number 102 ("OR No. 102"). OR No. 102 contacted Defendants and indicated that she would not settle Defendants' claims against her. Defendants filed suit against OR No. 102 and obtained a default judgment against her in the amount of \$5,870.

95. No. 92390003, Oregon Resident Number 103 ("OR No. 103"). OR No. 103 contacted Defendants and, after negotiation, agreed to settle Defendants' claims against her for a payment of \$2,300.
96. No. 92601491, Oregon Resident Number 104 ("OR No. 104"). OR No. 104 contacted Defendants to discuss settlement. After reaching an agreement in principle to settle Defendants' claims against her for \$4,600 payable over six months, OR No. 104 stopped returning Defendants' calls. Defendants proceeded with litigation and obtained a default judgment against her in the amount of \$7,920.
97. No. 92777170, Oregon Resident Number 105 ("OR No. 105"). OR No. 105 contacted Defendants and agreed to settle Defendants' claims against him for a payment of \$5,000.
98. No. 93691324, Oregon Residents Numbers 106 ("OR No. 106") and 107 ("OR No. 107"). OR No. 106 and OR No. 107 contacted Defendants and, after negotiation, agreed to settle Defendants' claims against them for a payment of \$3,750.
99. No. 93807215, Oregon Resident Number 108 ("OR No. 108"). OR No. 108's attorney contacted Defendants and, after negotiation, agreed to settle Defendants' claims against OR No. 108 for a payment of \$3,750.
100. No. 94116812, Oregon Resident Number 109 ("OR No. 109"). OR No. 109 contacted Defendants and, after negotiation, agreed to settle Defendants' claims against him for a payment of \$1,200.
101. No. 94394650, Oregon Resident Number 110 ("OR No. 110"). After several attempts to contact OR No. 110, Defendants filed suit against her and obtained a default judgment against her in the amount of \$6,550.
102. No. 95667872, Oregon Resident Number 111 ("OR No. 111"). OR No. 111 contacted Defendants and agreed to settle Defendants' claims against him for a payment of \$3,750.