

1 UNITED STATES DISTRICT COURT
2
3 CENTRAL DISTRICT OF CALIFORNIA

4 IN RE THE HONEST COMPANY,
5 INC. SECURITIES LITIGATION

Case No. 21-CV-07405-MCS-AS

6 SUPPLEMENTAL DECLARATION
7 OF ALEXANDER VILLANOVA
8 REGARDING (A) MAILING OF
9 THE SETTLEMENT POSTCARD;
10 AND (B) CLAIMS RECEIVED TO
DATE

11 I, Alexander Villanova, declare under penalty of perjury, pursuant to 28 U.S.C.
12 § 1746, that the following is true:

13 1. I am a Senior Project Manager for Epiq Class Action and Claims
14 Solutions, Inc. (“Epiq”). The statements of fact in this declaration are based on my
15 personal knowledge and information provided to me by my colleagues in the ordinary
16 course of business and, if called on to do so, I could and would testify competently
17 thereto.

18 2. Epiq was appointed as the Claims Administrator pursuant to the Court’s
19 Order Re: Motion for Preliminary Approval of Class Action Settlement, dated May 6,
20 2025 (the “Preliminary Approval Order”) (ECF No. 311), and in accordance with the
21 Stipulation and Agreement of Settlement, dated March 11, 2025 (the “Stipulation”).¹ I
22 submit this declaration as a supplement to my earlier declaration, the Declaration of
23 Alexander Villanova Regarding (A) Mailing of the Settlement Postcard and (B)
24 Publication of the Summary Notice (“Initial Mailing Declaration”).

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28 ¹ All capitalized terms not otherwise defined in this document shall have the same
meanings ascribed to them in the Stipulation.

1 **CONTINUATION OF DISSEMINATION OF THE**
2 **SETTLEMENT POSTCARD**

3 3. Since the execution of the Initial Mailing Declaration, Epiq has continued
4 to receive requests for Settlement Postcards from potential Class Members and their
5 nominees. Through July 15, 2025, Epiq has mailed an additional 7 Settlement Postcards
6 for a total of 36,356 postcards mailed.

7 **UPDATE ON CALL CENTER SERVICES AND**
8 **CASE WEBSITE**

9 4. Epiq continues to maintain the toll-free number (1-888-670-8722) and
10 Interactive Voice Recording (“IVR”) to accommodate potential Class Members. As of
11 July 15, 2025, there have been a total of 83 calls to the toll-free telephone number. Epiq
12 has promptly responded to each telephone inquiry and will continue to address potential
13 Class Members’ inquiries.

14 5. Epiq also continues to maintain the website dedicated to the case
15 www.TheHonestCompanySecuritiesLitigation.com (the “Case Website”) to assist
16 potential Class Members. Through July 15, 2025, the Case Website has received 12,372
17 visits. The website will continue to be updated with relevant case information and court
18 documents.

19 **CLAIM FILING STATUS**

20 6. The notices and Claim Form informed Class Members that in order to
21 qualify for a payment from the Net Settlement Fund, a Claim Form with supporting
22 documentation must be submitted by July 14, 2025. As of July 15, 2025, Epiq has
23 received approximately 129,792 claims. Of the claims received through July 15, 2025,
24 approximately 128,852 claims were filed electronically by institutions, approximately
25 140 claims were submitted by mail, and approximately 800 claims were submitted
26 through the Case Website’s claim filing portal.
27
28

7. A preliminary unaudited estimate of losses, calculated pursuant to the proposed Plan of Allocation set forth in the Notice, for the 129,792 claims received through July 15, 2025, is approximately \$183,118,555 and the average loss per claim is approximately \$1,410. The provisionally eligible claims report that approximately 52,138,461 shares were purchased and damaged during the Class Period. There are 12,776 provisionally ineligible claims. However, these figures are only preliminary and do not include any quality assurance review. Additionally, the claim deadline has just recently passed and it is possible additional claims will be submitted and accepted. Importantly, claimants will be notified about deficiencies in their claims and be given an opportunity to cure any deficient or rejected claims.²

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on July 16, 2025, in Tigard, OR.

all

Alexander Villanova

² As Epiq is still receiving claims and currently in the process of reviewing and analyzing the claims received through July 15, 2025, the information provided herein is subject to further review, analysis, and quality control and is intended only for informational purposes at this time.