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2
3 **UNITED STATES DISTRICT COURT**
4 **WESTERN DISTRICT OF WASHINGTON**
5 **AT SEATTLE**

6 SEAN WILSON, individually and on behalf of all
7 other persons similarly situated,

8 Plaintiff,

9 v.

10 PLAYTIKA, LTD., an Israeli limited company,
11 and CAESARS INTERACTIVE
12 ENTERTAINMENT, LLC., a Delaware limited
13 liability company.

14 Defendants.

CASE NO. 18-CV-05277

**DECLARATION OF JEANNE C.
FINEGAN, APR CONCERNING
CLASS MEMBER NOTIFICATION**

15 I, JEANNE C. FINEGAN declare as follows:

16
17 **INTRODUCTION**

18 1. I am President and Chief Media Officer of HF Media, LLC, Inc. (“HF”) a division of
19 Heffler Claims Group LLC (“Heffler”). This Declaration is based upon my personal knowledge as
20 well as information provided to me by my associates and staff, including information reasonably
21 relied upon in the fields of advertising media and communications.

22 2. Pursuant to the Settlement Agreement, dated August 6, 2020, Heffler was engaged by
23 the parties to this litigation to develop and implement a legal notice program as part of the parties’
24 proposed class action settlement.

25 3. The purpose for this Declaration is to provide a final status update concerning the
26 successful implementation of the notice program for this settlement, which commenced on November
27 9, 2020 and was substantially completed on December 8, 2020. The Notice Program employed best-
28 in-class tools and technology to reach at least 82% of Settlement Class Members in Washington, on
average 4 times, through online display, search and social impressions with cross-device targeting on

1 desktop and mobile, streaming radio, a settlement website and a toll-free number.

2 **QUALIFICATIONS**

3 4. A comprehensive description of my credentials and experience that qualify me to
4 provide expert opinions on the adequacy of the class action notice program was previously filed with
5 this Court on August 6, 2020. In summary, I have served as an expert directly responsible for the
6 design and implementation of over 1,000 legal notice programs, some of which are the largest and
7 most complex programs ever implemented in both the United States and Canada.

8 **NOTICE PROGRAM SUMMARY**

9 5. The notice program for this settlement was designed to inform Class Members of the
10 class action settlement between Plaintiff and Defendants Playtika, LTD. and Ceasars Interactive
11 Entertainment, LLC. Pursuant to the Settlement Agreement, § I paragraph 1.31, the Settlement Class
12 is defined as:

13 “All Washington residents (as reasonably determined by IP address information or
14 other information furnished by Platform Providers) who played the Applications on or
15 before preliminary approval of the settlement.”

16 6. The notice program included the following components:

- 17 • Direct e-mail or first-class U.S. mail notice to reasonably and readily identifiable
18 Class Members;
19 • Online display banner advertising specifically targeted to reach Class members;
20 • Keyword Search targeting Class members;
21 • Social media through Facebook, Instagram, YouTube and Twitter;
22 • An informational website was established on which the notices and other
23 important Court documents are posted; and
24 • A toll-free information line was established by which Class Members could call
25 24/7 for more information about the Settlement, including, but not limited to,
26 requesting copies of the Long Form Notice or Claim Form.
27
28

DIRECT NOTICE

1
2 7. Details of the direct notice outreach are fully described in the declaration of Heffler’s
3 Client Services Manager, Brian Smitheman.

4 **ONLINE DISPLAY AND SOCIAL MEDIA**

5 8. A total of more than 23 million impressions ran across targeted apps, websites, search
6 and the social media platforms Facebook, Instagram, YouTube and Twitter.

7 9. The media campaign targeted people while they used Playtika Applications or visited
8 their online sites - Slotomania, Vegas Casino Slots, Slots Casino- House of Fun, Caesars Casino
9 Official Slots, Vegas Downtown, as well as similar applications and websites.

10 10. Keyword search targeting was employed to show advertisements to users in their
11 Google search results and in their Gmail inboxes. A list of keywords and search topics including
12 gaming settlement, Playtika class action, Slotomania, House of Fun, Caesars Casino and World Series
13 of Poker, among others, were applied. Gmail ads were shown at the top of inbox tabs and were
14 expandable to show additional text and images.

15 11. Attached as **Exhibit A** are copies of the online display ads.

16 **SOCIAL MEDIA: FACEBOOK, INSTAGRAM, YOUTUBE AND TWITTER**

17 12. On Facebook and Instagram, ads were targeted to those who have liked or followed
18 Playtika and other gaming pages as well as adults in Washington. On YouTube, ads were targeted
19 to adults in Washington. On Twitter, ads were targeted to users who follow Playtika and other similar
20 handles. The social media campaign included retargeting to users who visited the Settlement website.

21 13. Attached as **Exhibit B** are copies of the social media notices.

22 **STREAMING RADIO**

23 14. Streaming radio ads with an accompanying banner ad ran on Pandora. 30-second audio
24 ads were targeted to casino app game downloaders and adults in Washington. Digital banner ads
25 appeared while the radio spot played, allowing a user to click on the banner to be directed to the
26 Settlement website.

27 **OFFICIAL SETTLEMENT WEBSITE**

28 15. An informational website was established and continues to be maintained by Heffler.
All of the aforementioned methods of notice directed Class Members to this website. The website

1 served as a “landing page for the banner advertising,” where Class Members can get information
2 about the Settlement and obtain and /or submit a Claim Form, along with other information which
3 includes information about the class action, their rights, the Long Form Notice, answers to frequently
4 asked questions, contact information that includes the address for the Claim Administrator and
5 addresses and telephone numbers for Plaintiffs’ Counsel, and a downloadable and online version of
6 the Claim Form with related information including the Settlement Agreement, and Court Orders.
7 Complete details concerning the Settlement website are found in the declaration of Heffler’s Client
8 Services Manager, Brian Smitheman.

8 **TOLL FREE INFORMATION LINE**

9 16. Additionally, Heffler established and maintains a 24-hour toll-free Interactive Voice
10 Response (“IVR”) telephone line, where callers may obtain information about the class action,
11 including, but not limited to, requesting copies of the Long Form Notice or Claim Form. Complete
12 details concerning the toll-free information line are found in the declaration of Heffler Client Services
13 Manager, Brian Smitheman.

14 **CONCLUSION**

15 17. In my opinion, the outreach efforts described above reflect a particularly appropriate,
16 highly targeted, efficient and effective way to employ notice to this Class. Through a multi-media
17 channel approach to notice, which employed online display, search, social and streaming radio, an
18 estimated 82 percent of targeted Class Members were reached by the media program, on average, 4
19 times. In my opinion, the efforts used in this notice program consisted of the best contemporary
20 communication standards and methods, were reasonably calculated to provide notice, and were
21 consistent with best practicable court-approved notice programs in similar matters, as well as in the
22 Federal Judicial Center’s guidelines concerning appropriate reach.

23 I declare under the penalty of perjury, under the laws of the United States of America, that the
24 foregoing is true and correct. Executed on December 11, 2020 in Tigard, Oregon.

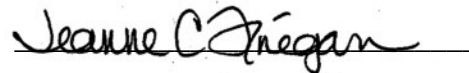
25
26 
27 Jeanne C. Finegan, APR
28

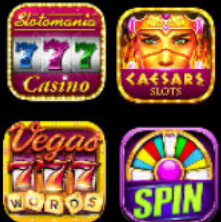
Exhibit A

DISPLAY BANNER ADS

Court-Ordered Notice

A Settlement has been reached in the case
Wilson v. Playtika
No. 3:18-cv-05277-RBL

DID YOU PLAY THESE PLAYTIKA GAMES IN WASHINGTON?



You could get money from a Settlement.

LEARN MORE

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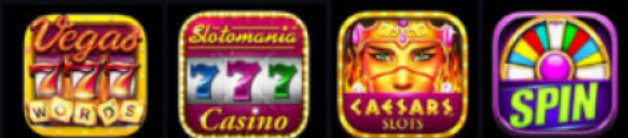
Exhibit B

SOCIAL MEDIA ADS

 **Legal Notices**
Sponsored · 

A Settlement has been reached in the case Wilson v. Playtika, No. 3:18-cv-05277-RBL.




Court-Ordered Notice



PLAYTIKASETTLEMENT.COM

Playtika Game Settlement [Learn More](#)

Did You Play These Playtika Games I...

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