

**IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT
IN AND FOR ORANGE COUNTY, FLORIDA**

SAUL HYMES, ILANA HARWAYNE-
GIDANSKY, EDGAR FIERRO, and JOAN
LEWIS individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

EARL ENTERPRISES HOLDINGS, INC.

Defendant.

Case No. 2021-CA-007617-O

CLASS REPRESENTATION

**PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT**

Plaintiffs, Saul Hymes, Ilana Harwayne-Gidansky, Edgar Fierro, and Joan Lewis, respectfully move for final approval of the Settlement and for certification of the Settlement Class.

I. INTRODUCTION

This Action was initiated following Earl Enterprises' announcement that it was the subject of third-party cyberattacks involving malware installed on Earl Enterprises' point-of-sale ("POS") systems for approximately ten (10) months, resulting in the exfiltration of its customers' personally identifiable information ("PII"), with the attacker claiming that the attack included approximately 2.15 million stolen card numbers (the "Data Breach Incident"). Plaintiffs allege, *inter alia*, that Earl Enterprises was negligent, breached its contracts with its customers, was unjustly enriched, breached customers' confidence, and violated state consumer protection laws when it failed to protect Plaintiffs' PII from being compromised in the Data Breach Incident at issue. As a result of swift litigation and mediation, the Parties reached a hard-fought and arms-length resolution.

The Settlement is fair, reasonable, and adequate, and is in the best interests of the nationwide Settlement Class Members (“Class Members”). The Settlement squarely addresses the issues raised in the Action and affords Class Members significant monetary and nonmonetary relief: tiered monetary relief to compensate Settlement Class Members for inconveniences and losses, and injunctive relief designed to better protect Earl Enterprises restaurants against similar data breaches that may again compromise consumers’ PII. The Settlement compares favorably with settlements in similar litigation and was reached only after intensive, arms-length negotiations before a neutral and experienced mediator and subsequent, multiple negotiation sessions following that mediation. If approved, the Settlement will resolve all claims arising out of the Data Breach Incident and will provide Settlement Class Members with the precise relief this Litigation was filed to obtain. In light of the current pandemic that has upended the lives and finances of millions, immediate relief is now more valuable than ever.

Accordingly, pursuant to Florida Rule of Civil Procedure 1.220 and the Settlement Agreement,¹ Plaintiffs respectfully request that the Court enter an order: (1) approving the Settlement as fair, reasonable, and adequate; (2) finally certifying the proposed Settlement Class; (3) appointing Plaintiffs as Class Representatives for the Settlement Class; (4) appointing John A. Yanchunis and Ryan J. McGee of Morgan & Morgan Complex Litigation Group, Matthew M. Guiney and Carl Malmstrom of Wolf Haldenstein Adler Freeman & Herz, LLP, Rosemary M. Rivas of Levi & Korsinsky, LLP, and Gayle M. Blatt of Casey Gerry Schenk Francavilla Blatt & Penfield, LLP, as Settlement Class Counsel; (5) finding that the Notice Program as implemented satisfies Rule 1.220 and Due Process; (6) appointing EisnerAmper, formerly known as Postlethwaite & Netterville to serve as the Settlement Administrator; (7) granting Class Counsel’s

¹ Unless otherwise stated, the Exhibits are to the Settlement Agreement.

motion for attorneys' fees and costs; and (8) granting any further relief as the Court deems just and proper.²

II. BACKGROUND

A. Information About the Settlement

To explore and potentially negotiate a class-wide settlement before a neutral, the Parties agreed to and did retain Rodney Max, *Esq.*, a highly experienced mediator, to assist the Parties in settlement negotiations. Declaration of John A. Yanchunis, filed concurrently herewith ("Yanch. Decl."), ¶ 14, attached hereto as **Exhibit 1**. Prior to the mediation, the Parties briefed their respective positions on the facts, claims, defenses, and assessments of the risk of litigation. *Id.* ¶ 16. The Parties also submitted a draft settlement term sheet prepared by Plaintiffs, which was then used as the foundation for the ensuing negotiations. *Id.* ¶ 16.

On February 19, 2020, the Parties, through their respective counsel, engaged in a full-day mediation session before Mr. Max. The negotiations were hard-fought throughout and the settlement process was conducted at arm's length. *Id.* ¶ 17. With the assistance of Mr. Max, the Parties were able to reach an initial resolution to the Litigation on a class-wide basis that provides both injunctive and monetary relief to Settlement Class Members. *Id.* ¶ 17. On February 20, 2020, the Parties had reached a term sheet outlining the substance of settlement. During the ensuing months, the Parties continued the exchange of information and negotiations as to the final details of the Settlement Agreement. *Id.* ¶ 17.

Based on Plaintiffs' counsel's independent investigation of the relevant facts and applicable law, experience with other data breach cases, the information provided by Defendant, and the strengths and weaknesses of the Parties' respective positions (including the defenses

² Following the claims and objections deadlines, Class Counsel will confer with counsel for Earl Enterprises and draft a proposed order on Final Approval for the Court's review.

articulated in Defendant's Motion to Dismiss and Reply to Plaintiffs' Opposition thereto), Plaintiffs' counsel determined that the Settlement is fair, reasonable, adequate, and in the best interest of the Settlement Class. Yanch. Decl., ¶ 19.

B. The Terms of the Settlement Agreement

Pursuant to the Settlement Agreement, Plaintiffs request that the Court provisionally certify the following Settlement Class:

All residents of the United States whose Personal Information was exposed or potentially exposed as a result of the Data Breach Incident.

SA ¶ 2.21.³

C. The Settlement Benefits

1. Cash Payments for Reimbursement of Out-of-Pocket Expenses

All Class Members who submit a valid and timely Claim Form and supporting documentation are eligible to receive up to \$5,000.00 per Settlement Class Member for reimbursement for documented out-of-pocket expenses incurred as a result of the Data Breach. To receive payment for out-of-pocket expenses, the Settlement Class Member must complete the appropriate section of the Claim Form and provide documentation supporting a claim for out-of-pocket expenses, which could include but is not limited to, a receipt from an affected restaurant reflecting payment by a payment card during the Data Breach Incident's Relevant Period; a payment card statement reflecting a charge at an affected restaurant during the Data Breach

³ Excluded from the Settlement Class are Defendant and any of its officers and directors; all Settlement Class Members who timely and validly request exclusion from the Settlement Class; the Judge and Magistrate Judge to whom the action is assigned and any member of those Judges' staffs or immediate family members; and any other person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding, or abetting the criminal activity or occurrence of the Data Breach Incident or who pleads *nolo contendere* to any such charge. SA, ¶ 2.21.

Incident's Relevant Period; or, notification from a bank or financial institution that a payment card was compromised as a result of the Data Breach Incident. SA ¶ 3.03.

To be considered valid, all Claim Forms and related documentation must be postmarked (or submitted electronically in accordance with the requirements for electronic submission of a Claim Form) on or before the Claims Deadline, which the Parties propose shall be the 90th day after the commencement of the Notice Program. SA ¶ 3.04(b).

2. Earl Enterprises Restaurant Vouchers

For those Settlement Class Members who do not have or cannot demonstrate out-of-pocket expenses, those Settlement Class Members who submit a valid and timely Claim Form and attest that they used a payment card at an affected Earl Enterprises restaurant during the Data Breach Incident's Relevant Period are eligible to receive two \$10.00 promotional cards for dining at either Planet Hollywood or Buca di Beppo. SA ¶ 3.02.

3. Remedial Measures

An additional benefit of the Settlement is the remedial measures that Earl Enterprises agrees to adopt, continue, or maintain as a result of this Litigation (SA ¶¶ 4.01–03), which will benefit all Settlement Class Members regardless of whether or not they submit a Claim, as well as consumers in general who may dine at Earl Enterprises restaurants in the future. These remedial measures include, but are not limited to: 1) implement an EMV/P2PE credit card solution for card-present transactions; 2) implement an intrusion prevention system and an intrusion detection system; 3) develop an attendance required security awareness training program to educate employees about computer security, corporate policies and procedures, and the most prevalent security threats; 4) implement file integrity monitoring (FIM) to test operating systems, databases, and application files for tampering; and 5) promptly comply with Payment Card Industry Data Security Standards (PCI-DSS). SA ¶¶ 4.01(a)–(e).

4. Attorneys' Fees, Costs, and Expenses and Service Awards

Class Counsel has requested, and Earl Enterprises has agreed to pay, subject to Court approval, the amount of \$195,000.00 for attorneys' fees, costs, and expenses. S.A. ¶ 11.02. Class Counsel also requested, and Earl Enterprises agreed to pay, subject to Court approval, the amount of \$2,500.00 for each of the four Class Representatives' service awards. S.A. ¶ 11.03. Notably, the parties did not negotiate this agreement or any other issue with respect to attorneys' fees, costs, and expenses until after they had reached an agreement on Class relief. Yanch. Decl. ¶ 23.

5. Release of Claims

Under the Settlement, each Settlement Class Member will release:

any and all claims, rights, rights of set-off and recoupment, demands, actions, obligations, and causes of action of any and every kind, nature, and character, known and unknown (and specifically including without limitation all Unknown Claims), including without limitation, negligence, negligence per se, breach of contract, breach of implied contract, breach of fiduciary duty, breach of confidence, invasion of privacy, misrepresentation (whether fraudulent, negligent, or innocent), unjust enrichment, bailment, wantonness, failure to provide adequate notice pursuant to any breach notification statute or common law duty, any federal, state, or local statutory or regulatory claims, including, but not limited to, pursuant to consumer protection laws, unfair and deceptive trade practice laws, and further including, but not limited to, any and all claims for damages, injunctive relief, disgorgement, declaratory relief, equitable relief, attorneys' fees, costs, and expenses, pre-judgment interest, credit monitoring services, the creation of a fund for future damages, statutory damages, punitive damages, special damages, exemplary damages, restitution, the appointment of a receiver, and any other form of relief that any Settlement Class Member has, has asserted, could have asserted, or could assert against any of the Released Persons based on, relating to, concerning, or arising out of the Data Breach Incident (including but not limited to the theft or compromise of Personal Information) or the allegations, facts, or circumstances described in the Litigation and/or Complaints.

S.A. ¶¶ 2.15, 2.16.

D. CLASS NOTICE AND CLAIMS

On September 7, 2023, the court appointed Postlethwaite & Netterville, now EisnerAmper (the "Settlement Administrator") to serve as the settlement administrator and effectuate notice of

the settlement to the class.

On or about October 6, 2023, the Settlement Administrator launched the Notice Program, which consisted of Publication Notice and a dedicated Settlement Website established and maintained by the Settlement Administrator that provides important dates and deadlines pertaining to the Settlement and have made and continue to make available important documents available for review and download. *See generally*, Declaration of Brandon Schwartz (“Schwartz Decl.”), attached as **Exhibit 2**. The Publication Notice consisted of: (i) Google & Yahoo Network of Sites; (ii) social media targeted ads; and (iii) Spotify audio and banner advertisements. *Id.* ¶¶ 6–8. This Publication Notice was implemented to help drive Class Members who were actively searching for information about the Settlement to the dedicated Settlement Website. *Id.* ¶¶ 9–10. In total, the Publication Notice efforts described above served approximately 314,636,714 impressions, an increase of more than 10,836,714 than anticipated. *Id.* ¶ 6. The stream radio also generated 590,269 banner impressions during the notice campaign. *Id.* ¶ 7. The Notice Program also included press releases that resulted in being picked up by 461 media outlets with a potential audience of 193,000,000 people. *Id.* ¶ 8.

The Settlement Administrator also activated the case-specific website dedicated to this Settlement: <http://earlsettlement.com> (the “Settlement Website”), where Settlement Class Members could file a claim directly. *Id.* ¶¶ 9–10. The Settlement Website was designed to be user-friendly and makes it easy for Settlement Class Members to find information about the Settlement. Settlement Class Members can view general information about this class action Settlement, review relevant Court documents, including the Long Form Notice, Claim Form, Settlement Agreement and Preliminary Approval Order, as well as view important dates and deadlines pertinent to the Settlement. *Id.* As of December 27, 2023, the Settlement Website has received 118,557 website

visits by 92,686 unique users totaling 144,096 pageviews. *Id.* ¶ 10.

The deadline for Class Members to submit claim forms is January 5, 2023. *Id.* ¶ 15. As of December 27, 2023, the Settlement Administrator has received a total of 1,911 claims, has received no requests to be excluded from the Settlement, and no class members have objected to the Settlement. *Id.* ¶ 15. Of the 1,911 claims, 1,789 are for promotional cards and 122 are for documented expense reimbursements. *Id.* To date, 11 documented expense reimbursements have been approved for a total of \$2,929.18, and the Settlement Administrator will continue with these efforts and Class Counsel will update the Court prior to the Final Approval hearing. *Id.*

III. ARGUMENT

A. Certification of the Settlement Class is Appropriate

Prior to granting final approval of a proposed settlement, the Court should first determine the proposed Settlement Class is appropriate for certification. *See* Fla. R. Civ. P. 1.220(a). Class certification is proper if the proposed class, proposed class representative, and proposed class counsel satisfy the numerosity, commonality, typicality, and adequacy of representation requirements under Florida law. Fla. R. Civ. P. 1.220(a)(1)-(4). Additionally, where (as here) certification is sought under Rule 1.220(b)(3), the plaintiff must demonstrate that common questions of law or fact predominate and that a class action is superior to other methods of adjudicating the claims. Fla. R. Civ. P. 1.220(b)(3). This case meets all of the Rule 1.220(a) and 1.220(b)(3) prerequisites, and for the reasons set forth below, certification is appropriate.

1. The Proposed Settlement Class Meets the Requirements of Rule 1.220(a).

a. Numerosity.

Numerosity requires “the members of the class are so numerous that separate joinder of each member is impracticable.” Fla. R. Civ. P. 1.220(a)(1). “No specific number and no precise

count are needed to sustain the numerosity requirement.” *Sosa v. Safeway Premium Finance Co.*, 73 So. 3d 91, 114 (Fla. 2011). “Rather, class certification is proper if the class representative does not base the projected class size on mere speculation.” *Id.*

Here, the Settlement Class contains approximately 2.15 million individuals. Thus, numerosity is easily satisfied.

b. Commonality.

The second prerequisite to certification is commonality, which means that “the claim or defense of the representative party raises questions of law or fact common to the questions of law or fact raised by the claim or defense of each member of the class.” Fla. R. Civ. P. 1.220(a)(2). “The threshold of the commonality requirement is not high” and “only requires that resolution of a class action affect all or a substantial number of the class members, and that the subject of the class action presents a question of *common or general interest*.” *Sosa*, 73 So. 3d at 107 (emphasis in original).

Here, the commonality requirement is readily satisfied. Settlement Class Members are joined by common questions of law and fact that arise from the same event—the Data Breach Incident. The critical issues posed by this litigation are whether:

1. The PII of Settlement Class Members was obtained by a third party without authorization due to compromised POS systems at Earl Enterprises’ affected restaurants;
2. Defendant had a duty to protect the PII of Settlement Class Members from disclosure; and
3. Settlement Class Members were injured by Defendant’s failure to protect their PII.

The central question behind every claim in this Litigation is whether Defendant adequately secured its consumers’ PII. The answer to that question depends on common evidence that does not vary from class member to class member, and can be fairly resolved on a class-wide basis—whether through litigation or settlement—for all Settlement Class Members at once. These

common issues converge at the center of Defendant’s conduct in this Litigation, satisfying the commonality requirement. *See, e.g., Hughley v. University of Central Florida Bd. of Trustees*, No. 2016-CA-001654-O, 2017 WL 9287318, at *2 (Fla. 9th Cir. Ct. Dec. 1, 2017) (commonality satisfied where “all members of the class are current or former students and/or employees of UCF whose personal information was accessed without authorization at UCF in early 2016”); *In re Countrywide Fin. Corp. Cust. Data Sec. Breach Litig.*, No. 3:08-MD-01998, 2009 WL 5184352, at *3 (W.D. Ky. Dec. 22, 2009) (commonality satisfied where all “class members had their private information stored in Countrywide’s databases at the time of the data breach.”).

c. Typicality.

The next prerequisite to certification, typicality, asks whether “the claim or defense of the representative party is typical of the claim or defense of each member of the class.” Fla. R. Civ. P. 1.220(a)(3). “The key inquiry for a trial court when it determines whether a proposed class satisfies the typicality requirement is whether the class representative possesses the same legal interest and has endured the same legal injury as the class members.” *Sosa*, 73 So. 3d at 114.

Here, typicality is satisfied for the same reasons as commonality. Specifically, Plaintiffs’ claims are typical of those of other Settlement Class Members because they arise from the Data Breach Incident. They are also based on the same legal theory, *i.e.*, that Earl Enterprises had legal duties to protect Plaintiffs’ and Settlement Class Members’ PII. Because there is a “sufficient nexus” between Plaintiffs’ and Settlement Class Members’ claims, typicality is met. Although Plaintiffs’ and the Settlement Class Members’ damages recovery might differ depending on out-of-pocket expenses incurred as a result of the Data Breach, such differences are “mere[ly] factual difference[s] . . . which does not preclude a finding of typicality.” *Id.* at 115 (holding that the plaintiffs’ and putative class members’ difference in damage recovery did not preclude a finding

of typicality). Because there is a “strong similarity,” between the legal theories and injuries upon which Plaintiffs’ claims are based, and the legal theories and injuries upon the claims of Settlement Class Members, typicality is satisfied. *Id.* at 114-15 (internal citations omitted).

d. Adequacy.

Rule 1.220(a)(4) requires that “the representative party can fairly and adequately protect and represent the interests of each member of the class.” “This inquiry serves to uncover conflicts of interest between the presumptive class representative and the class he or she seeks to represent.” *Sosa*, 73 So. 3d at 115. “A trial court’s inquiry concerning whether the adequacy requirement is satisfied contains two prongs.” *Id.* “The first prong concerns the qualifications, experience, and ability of class counsel to conduct the litigation.” *Id.* “The second prong pertains to whether the class representative’s interests are antagonistic to the interests of the class members.” *Id.*

Here, both components are satisfied because Plaintiffs are represented by qualified and competent counsel, and because Plaintiffs’ interests in this Litigation are aligned with, and not antagonistic to, those of the Settlement Class. First, proposed Settlement Class Counsel are experienced in nationwide class action litigation; with respect to data breach class actions, the undersigned are well recognized practice leaders. Yanch. Decl., ¶ 11. Moreover, because Plaintiffs and their counsel have devoted considerable time and resources to this Litigation and have shown a deft understanding of the issues in this Litigation, the adequacy requirement is satisfied. *Id.* ¶ 12. Second, Plaintiffs provided their PII to Defendant and allege that their PII was compromised as a result of the Data Breach Incident, just as the PII of the Settlement Class Members was also allegedly compromised. Indeed, Plaintiffs’ claims are identical to the claims of Settlement Class Members, and Plaintiffs and the Settlement Class Members desire the same outcome in this Litigation. Plaintiffs have vigorously prosecuted this case thus far for the benefit of all Settlement

Class Members. *Id.* Plaintiffs have participated in the Litigation, reviewed pleadings, participated in informal discovery, and provided input in crafting and approving the Settlement. *Id.* ¶ 13. Accordingly, the adequacy requirement is satisfied for purposes of approving the Settlement Agreement and conditionally certifying the Settlement Class.

2. The Predominance and Superiority Requirements of Are Met.

In addition to meeting Rule 1.220(a), the proposed Settlement Class must also meet one of the three requirements of Rule 1.220(b). Here, Plaintiffs seek certification under Rule 1.220(b)(3), which requires that: (1) “questions of law or fact common to the claim or defense of the representative party and the claim or defense of each member of the class predominate over any question of law or fact affecting only individual members of the class” and (2) “class representation is superior to other available methods for the fair and efficient adjudication of the controversy.”

a. Predominance.

“Florida courts have held that common questions of fact predominate when the defendant acts toward the class members in a similar or common way.” *Sosa*, 73 So. 3d at 111. “The predominance and commonality requirements parallel one another, but are not identical. The predominance requirement is more stringent because, to satisfy this requirement, common questions must not only exist but also predominate and pervade.” *Id.*

“The methodology employed by a trial court in determining whether class claims predominate over individual claims involves a proof-based inquiry.” *Id.* at 112. More specifically, a class representative establishes predominance if he or she demonstrates a reasonable methodology for generalized proof of class-wide impact.” *Id.* “A class representative accomplishes this if he or she, by proving his or her own individual case, necessarily proves the cases of the other class members.” *Id.*

“Whether class claims predominate also requires the consideration of how the resolution of the class claims will affect each class member's underlying cause of action.” *Id.* “If, in examining the claims, a trial court finds that common issues of fact and law impact more substantially the efforts of every class member to prove liability than the individual issues that may arise, then class claims predominate.” *Id.* “However, it is not the burden of the class representative to illustrate that all questions of fact or law are common.” *Id.*

Common issues readily predominate here because the central liability question in this case—whether Earl Enterprises failed to safeguard Plaintiffs’ PII, like that of every other Settlement Class Member—can be established through generalized evidence. Several case-dispositive questions could be resolved identically for all members of the Settlement Class, such as whether Earl Enterprises had duties to exercise reasonable care in safeguarding, securing, and protecting their PII and whether Earl Enterprises breached those duties. The many common questions that arise from Earl Enterprises’ conduct predominate over individualized issues. Because the claims are being certified for settlement purposes, there are no manageability issues.

b. Superiority.

Finally, a class action is superior to other methods available to fairly, adequately, and efficiently resolve the claims of the proposed Settlement Class. “Three factors for courts to consider when deciding whether a class action is the superior method of adjudicating a controversy are (1) whether a class action would provide the class members with the only economically viable remedy; (2) whether there is a likelihood that the individual claims are large enough to justify the expense of separate litigation; and (3) whether a class action cause of action is manageable.” *Sosa*, 73 o. 3d at 116.

Here, resolution of numerous claims in one action is far superior to individual lawsuits,

because it promotes consistency and efficiency of adjudication. Indeed, absent class treatment, each Settlement Class Member will be required to present the same or essentially the same legal and factual arguments, in separate and duplicative proceedings, the result of which would be a multiplicity of trials conducted at enormous expense to both the judiciary and the litigants. Moreover, there is no indication that Settlement Class Members have an interest or incentive to pursue their claims individually, given the amount of damages likely to be recovered, relative to the resources and expense required to prosecute such an action. Additionally, the Settlement will give the parties the benefit of finality.

B. The Settlement Is Fair, Reasonable, and Adequate.

The Court should approve a class action settlement if it is fair, reasonable, and adequate. *Gross v. Fidelity Nat'l Title Ins. Co.*, 983 So. 2d 1165, 1173 (Fla. 3d DCA 2008); *Nelson v. Wakulla County*, 985 So. 2d 564, 570 (Fla. 1st DCA 2008). Factors relevant to the fairness, reasonableness, and adequacy of settlement include:

- (1) the likelihood of success at trial;
- (2) the range of possible recovery;
- (3) the point over or below the range of possible recovery at which a settlement is fair, adequate, and reasonable;
- (4) the complexity, expense, and duration of the litigation;
- (5) the substance and amount of opposition to the settlement; and
- (6) the stage of the proceedings at which the settlement was achieved.

Nelson, 985 So. 2d at 570.

1. The Likelihood of Success at Trial

The relief offered by the Settlement is adequate considering the risks of continued litigation. Although Plaintiffs are confident in the merits of their claims, the risks involved in

prosecuting a class action through trial cannot be disregarded. Plaintiffs' claims would still need to succeed against any motions to dismiss, a motion for class certification, against any motions for summary judgment, and likely survive any appeal thereof.

Here, the central legal issues affecting the Settlement Class are as attacks on the substantive claims Plaintiffs have alleged. Nevertheless, and despite the strength of the Settlement, Plaintiffs are pragmatic in their awareness of the various defenses available to Earl Enterprises, as well as the risks inherent to continued litigation. Earl Enterprises has consistently denied the allegations and made clear that it would vigorously defend this case through trial as needed.

2. The Range of Possible Recovery

“It has been held that a court should first determine the possible range of recovery by resolving various damage issues, then determine wherein this range of possible recovery does a fair, adequate and reasonable settlement lie.” *Andrews v. Ocean Reef Club, Inc.*, 1993 WL 563622, at *7 (Fla. 16th Jud. Cir. Jan. 22, 1993). “The first step in calculating the possible range of recovery is determining the appropriate standard of damages.” *Id.*

“[F]or the purpose of determining the range of settlement, a court must utilize each side's arguments.” *Id.* “For the lowest value, the court should accept the defendants' arguments and for the highest value, the court should accept all of the plaintiffs' arguments.” *Id.* “Once the range of recovery is determined, the court must next determine wherein this possible range of recovery a fair, adequate and reasonable settlement would lie, given the facts of the case.” *Id.*

Here, the range of possible recovery of damages is not set by statute or otherwise readily calculated. Moreover, the damages for each Settlement Class Member turn on the extent to which such Settlement Class Members has incurred ordinary expenses or extraordinary expenses. These may run in the hundreds or thousands of dollars depending on whether Settlement Class Members spent time addressing the incident, paid for their own credit monitoring, or incurred out-of-pocket

expenses like fraud.

As for equitable relief, the range of possible recovery would range from Earl Enterprises implementing no changes to its security infrastructure to implementing verifiable contractual data security procedures intended to increase the protecting against future authorized access to Plaintiffs' and Settlement Class Members' PII.

3. The Point Over or Below the Range of Possible Recovery at Which a Settlement is Fair, Adequate, and Reasonable

The proposed settlement allows (1) each Settlement Class Member to recover up to \$5,000 for out-of-pocket expenses, and (2) two \$10 vouchers. These benefits are fair, reasonable, and adequate given the complexity and potential expense and duration of this litigation. *See, e.g., Lazarus v. City of Hallandale Beach*, 2013 WL 6331156, at *2 (Fla. 17th Jud. Cir. Apr. 22, 2013) (finding potential cash payment of \$3.15 as to single defendant, notwithstanding claim for \$125.00 as to multiple defendants, fair in light of the complexity, expense, and duration of the litigation).

As for equitable relief, Earl Enterprises has agreed to implement verifiable contractual data security procedures intended to increase protection against future unauthorized access to Plaintiffs' and Settlement Class Members' PII. This further supports to fairness, reasonableness, and adequacy of the proposed settlement.

4. The Complexity, Expense, and Duration of the Litigation

Without this settlement, complex and expensive litigation would remain, including the factual and legal issues that would arise and be disputed in: (1) Earl Enterprises' motion to dismiss that was filed in federal court and would have been substantially similar in state court, and any additional hearings, (2) discovery on the merits, (3) summary judgment proceedings, (4) class certification, and (5) trial. *See Hughley v. Univ. of Cent. Fla. Bd. Of Trustees*, 2018 WL 2269494, at *3 (Fla. Ninth Jud. Cir. Apr. 23, 2018) (finding these considerations satisfied this factor).

5. The Substance and Amount of Opposition to the Settlement

As of this filing there have been no requests for exclusion from the settlement and no class members have objected to the settlement. This weighs heavily in favor of settlement approval. *See, e.g., Hughley*, 2018 WL 2269494 at *3 (finding this factor satisfied where no objections lodged).

6. The Stage of the Proceedings at Which the Settlement was Achieved

It could take several years for this case to proceed through Earl Enterprises' motion to dismiss, certification of the class, discovery related to the merits, and summary judgment proceedings. Either party could appeal any judgment. Affording relief to the Settlement Class Members now weighs in favor of settlement approval. *See, e.g., Hughley*, 2018 WL 2269494 at *3 (finding these considerations satisfied this factor).

E. The Attorneys' Fees and Costs, and Service Awards Should be Approved

The \$195,000.00 requested in attorneys' fees and costs represents a negative multiplier of Class Counsel's lodestar (0.35 at the time of filing, and since then Class Counsel have devoted additional time to reviewing weekly updates from the Settlement Administrator and preparing this motion for Final Approval), inherently appropriate under the test approved by the Florida Supreme Court and set forth in *Florida Patient's Compensation Fund v. Rowe*, 472 So. 2d 1145, 1150 (Fla. 1985) and *Standard Guarantee Insurance Co. v. Quanstrom*, 555 So. 2d 828, 833-34 (Fla. 1985). As discussed at length in Plaintiffs' Fee Motion (filed on November 10, 2023), these fees are reasonable in light of the factors described by Rule 4-1.5 of the Rules of Professional Conduct, including: the time and labor required, the complexity and difficulty of the questions, the contingent nature of the case, the customary fee sought in class action litigation, and the experience of the attorneys involved. Accordingly, this factor also weighs in favor of final approval, where no Settlement Class Member has objected to the amount sought.

IV. CONCLUSION

For the foregoing reasons, Plaintiffs respectfully request that the Court enter an order granting Plaintiffs' Motion for Final Approval of the Settlement, including disbursement of the settlement funds and benefits, final certification of the settlement class, and an award of attorneys' fees, costs, and expenses.

Dated: December 29, 2023

Respectfully submitted,

/s/ John A. Yanchunis
MORGAN & MORGAN
COMPLEX LITIGATION GROUP
John A. Yanchunis
jyanchunis@ForThePeople.com
Ryan J. McGee
rmcgee@ForThePeople.com
201 N. Franklin Street, 7th Floor
Tampa, Florida 33602
Telephone: (813) 223-5505
Facsimile: (813) 223-5402

WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLP
Matthew M. Guiney*
guiney@whafh.com
270 Madison Avenue
New York, New York 10016
Telephone: 212/545-4600
Facsimile: 212/545-4653

WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLC
Carl Malmstrom*
malmstrom@whafh.com
111 W. Jackson St., Suite 1700
Chicago, IL 60604
Telephone: 312/984-0000
Facsimile: 212/545-4653

WALSH BANKS LAW
Brian M. Walsh (FBN 10968)

brian.walsh@walshbanks.com

105 E. Robinson Street, #303
Orlando, FL 32801
Tel: (407) 259-2426
Fax: (407) 391-3626

LEVI & KORSINSKY LLP

Mark S. Reich*

mreich@zlk.com

Courtney Maccarone*

cmaccarone@zlk.com

55 Broadway, 10th Floor
New York, NY 10006
Tel: (212) 363-7500
Fax: (212) 363-7171

**CASEY GERRY SCHENK FRANCAVILLA
BLATT & PENFIELD, LLP**

Gayle M. Blatt*

gmb@cglaw.com

110 Laurel Street
San Diego, CA 92101
Tel.: (619) 238-1811
Fax: (619) 544-9232

* *pro hac vice* forthcoming

Attorneys for Plaintiffs and the Putative Class

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 29, 2023, I electronically filed a true and correct copy of the foregoing unopposed motion with the Clerk of the Court using the court's electronic filing system, which will send notification to all attorneys of record in this matter.

/s/ John A. Yanchunis
John A. Yanchunis

EXHIBIT 1

**IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT
IN AND FOR ORANGE COUNTY, FLORIDA**

SAUL HYMES, ILANA HARWAYNE-
GIDANSKY, EDGAR FIERRO, and JOAN
LEWIS individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

EARL ENTERPRISES HOLDINGS, INC.

Defendant.

Case No. 2021-CA-007617-O

**DECLARATION OF JOHN A.
YANCHUNIS IN SUPPORT OF
FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

I, John A. Yanchunis, declare as follows:

1. I have been licensed to practice law in the state of Florida since 1981.
2. I am one of the attorneys for the Plaintiffs and the proposed Settlement Class in this case. I submit this declaration in support of the Motion for Final Approval of the Class Action Settlement. The facts herein stated are true of my own personal knowledge, and if called to testify to such facts, I could and would do so competently.
3. I lead the Class Action Department at Morgan & Morgan. Morgan & Morgan is the largest Plaintiff's, contingency-only law firm in the country, with over 900 lawyers in more than 50 offices throughout the United States. Its depth as a trial firm, and its self-funded financial resources, allow it to undertake the largest and most significant cases throughout the country.
4. My practice—which began after completing a two-year clerkship with United States District Judge Carl O. Bue, Jr., Southern District of Texas, Houston Division—has concentrated on complex litigation and spans over 38 years, including consumer class actions for more than two-thirds of that time. I have represented consumers in numerous successful class actions involving a wide variety of claims and topics from anti-trust, securities, civil rights, defective products, deceptive and unfair trade practices, common law fraud, and the protection of the privacy rights of consumers.

5. I was appointed co-lead counsel in the successful prosecution of the two largest class action cases in the United States: *Fresco v. Automotive Directions, Inc.*, Case No. 03-61063-JEM, and *Fresco v. R.L. Polk*, Case 0:07-cv-60695-JEM (Southern District of Florida). These cases were filed against the world's largest data and information brokers—Experian, R.L. Polk, Acxiom, Reed Elsevier (which owns Lexis-Nexis) and others—to protect the important privacy rights of consumers.

6. I presently serve, or have served in the past, as lead, co-lead, or class counsel in numerous multi-district litigations across the country in a wide variety of areas affecting consumers. For instance, I presently serve as co-lead of the *In re: Capitol One Consumer Data Sec. Breach Litig.*, No. 1:19-md-02915 (E.D. Va.). I have also served as co-lead of the *Home Depot Data Breach*, a member of the five-member overall Executive Committee in the *Target Data Breach*, No. 0:14-md-02522-PAM (Dist. Minn.), a member of the three-member Plaintiffs' Steering Committee in *In re: U.S. Office Personnel Mgmt Data Security Breach Litig.*, 1:15-cv-01321-ABJ (D.D.C.), and a member of the Plaintiffs' Steering Committee in *In re Equifax, Inc. Customer Data Security Breach Litigation*, 1:17-md-2800-TWT (N.D. Ga.). I also served as lead counsel in *In re Yahoo! Inc. Customer Data Sec. Breach Litig.*, 16-MD-02752-LHK (N.D. Cal.), a case involving a data breach of over 2.9 billion users of Yahoo's email service.

7. As a result of my experience in litigation against the insurance industry, including class litigation, I served as lead counsel for the insurance regulators for the state of Florida in connection with their investigations of a number of insurance companies and brokers of allegations of price fixing, bidding rigging, undisclosed compensation and other related conduct, and negotiated a number of settlements with insurance companies and brokers who were the subject of those investigations. These investigations resulted in the recovery of millions of dollars for Florida policyholders and the implementation of changes to the way insurance is sold in Florida and throughout the United States.

8. During my career, I have tried numerous cases in state and federal courts, including one of the largest and longest insurance coverage cases in U.S. history, which was filed in 1991

by The Celotex Corporation and its subsidiary, Carey Canada, Inc. During the seventeen years the case pended, I served as lead counsel for several insurance companies regarding coverage for asbestos and environmental claims. The case was tried in three phases over several years beginning in 1992. I was also lead counsel for these parties in the subsequent appeals that followed a judgment in favor of my clients.

9. As result of my experience in the area of class litigation and ethics, I have served as an expert for The Florida Bar on ethical issues arising in class action litigation.

10. I am currently a member in good standing of The Florida Bar, and of all the bars to which I have been admitted, including the United States Supreme Court, the United States Court of Appeals for the Fifth, Sixth, Seventh, Ninth, and Eleventh Circuits, and the United States District Courts of the Southern District of Texas, Northern District of Texas, Eastern District of Wisconsin, Western District of Wisconsin, Western District of Tennessee, Middle District of Florida, Southern District of Florida, Eastern District of Michigan, and Northern District of Illinois.

11. The Plaintiffs request that the Court appoint myself and Ryan J. McGee of my firm, Matthew M. Guiney and Carl Malmstrom of Wolf Haldenstein Adler Freeman & Herz, LLP, Mark S. Reich and Courtney Maccarone of Levi & Korsinsky, LLP, and Gayle M. Blatt of Casey Gerry Schenk Francavilla Blatt & Penfield, LLP, as Settlement Class Counsel (collectively, "Class Counsel"). Proposed Settlement Class Counsel are experienced in nationwide class action litigation; with respect to data breach class actions, the undersigned are well recognized practice leaders.

12. Class Counsel have invested considerable time and resources into the investigation of the facts underlying the claims, including the interviews of numerous class members who contacted Class Counsel, and the prosecution of this action. Since the outset of this litigation, the firms have cooperatively and effectively collaborated to prosecute, and ultimately resolve, this case on behalf of their clients and the Class. They have performed work critical to achieving benefits for the Class, including by investigating the facts surrounding the data breach, researching

and analyzing legal claims under state and federal law and common law, preparing and filing the Complaint, participating in meetings with defense counsel to discuss the Parties' respective positions, negotiating the proposed Settlement, drafting the motion for preliminary approval, and this Motion for Final Approval.

13. Throughout the pendency of this case, my co-counsel and I have maintained regular contact with the Plaintiffs to discuss with them the prosecution of the case. With the assistance of counsel, Plaintiffs have been at the helm of this case and continue to be focused on the advancement of the interests and claims of the Class over their own interests. They have always been concerned about obtaining a result that was best for the Class. Plaintiffs are adequate class representatives with no conflicts of interest.

14. This Action was initiated following Earl's announcement that it was the subject of third-party cyberattacks involving malware installed on Earl's point-of-sale ("POS") systems for approximately ten (10) months, resulting in the exfiltration of 2.15 million of its customers' personally identifiable information ("PII") (the "Data Breach"). Plaintiffs allege, *inter alia*, that Earl was negligent, breached its contracts with its customers, was unjustly enriched, breached customers' confidence, and violated state consumer protection laws when it failed to protect Plaintiffs' PII from being compromised in the Data Breach at issue. The Data Breach involved an estimated 2.15 million cards that were located and for sale on the dark web through a site called "Joker's Stash" beginning as early as February 20, 2019, according to blogger Brian Krebs.

15. Immediately upon learning of the Data Breach, Class Counsel worked vigorously to remedy the harms imposed on the Settlement Class. This Action was filed in Federal Court on April 3, 2019. Following briefing a motion to dismiss and Plaintiffs' responses thereto, the Parties agreed to and did retain Rodney Max, *Esq.*, a highly experienced mediator, to assist the Parties in settlement negotiations.

16. Prior to the mediation, the Parties briefed their respective positions on the facts, claims, defenses, and assessments of the risk of litigation. The Parties also submitted a draft

settlement term sheet prepared by Plaintiffs, which was then used as the foundation for the ensuing negotiations.

17. On February 19, 2020, the Parties, through their respective counsel, engaged in a full-day mediation session before Mr. Rodney Max. The negotiations were hard-fought throughout and the settlement process was conducted at arm's length. With the assistance of Mr. Max, the Parties were able to reach an initial resolution to the Action on a class-wide basis that provides both injunctive and monetary relief to Class Members. On February 20, 2020, the Federal court was advised that the Parties had reached a final, comprehensive settlement. During the ensuing months, the Parties continued the exchange of information and negotiations as to the final details of the Settlement Agreement.

18. The parties subsequently dismissed this litigation from Federal court and agreed to re-file this matter in state court, and continued to exchange information and negotiations as to the final details of the Settlement Agreement.

19. Based on Plaintiffs' counsel's independent investigation of the relevant facts and applicable law, experience with other data breach cases, the information provided by Defendant, and the strengths and weaknesses of the Parties' respective positions (including the defenses articulated in Defendant's Motion to Dismiss and Reply to Plaintiffs' Opposition thereto), Plaintiffs' counsel determined that the Settlement is fair, reasonable, adequate, and in the best interest of the Settlement Class.

20. Thus, the Settlement was reached as a result of extensive, arm's length negotiations between experienced counsel, was informed by counsel's review information and data voluntarily produced by the respective parties, and utilized an experienced neutral in Mr. Max, who enhanced the negotiations.

21. The proposed total Settlement value here exceeds \$650,000.00 (without the sum of the promotional cards for self-attest time) falls within a range of possible approval. This is particularly true given the real and substantial risk that Plaintiffs and the Settlement Class could

have recovered nothing if litigation had continued due to defenses and the proof of damages that could be recovered in this case not being certain.

22. As discussed in detail in Plaintiffs' Motion for Preliminary Approval filed October 26, 2022, and the Motion for Final Approval filed concurrently herewith, the Settlement is fair, reasonable, and adequate, and represents an excellent result for the Settlement Class.

23. The Parties negotiated Class Counsel's attorneys' fees, costs, and expenses, and Service Awards, separately and only after the Parties had reached an agreement on the benefits afforded to the Settlement Class by the Settlement

24. Defendant has agreed that Class Counsel is entitled to seek an award of reasonable attorneys' fees, costs, and expenses for prosecuting this action not to exceed \$195,000.00. S.A. § 11.02.

25. The \$195,000.00 requested in attorneys' fees and costs represents a negative multiplier of Class Counsel's lodestar (0.35 at the time of filing, and since then Class Counsel have devoted additional time to reviewing weekly updates from the Settlement Administrator and preparing this motion for Final Approval).

26. Throughout the settlement process, my co-counsel and I carefully weighed with the Plaintiffs: (1) the benefits to the Class under the terms of this Settlement Agreement, which provides significant relief to the Class; (2) the relatively small damages which might have been sustained by the Class, the likelihood that in the absence of a class action many consumers would not pursue individual claims, particularly due to the cost to litigate these claims if pursued in individual litigation, and the fact that the small damages would not justify the retention of an attorney to pursue the claims individually; (3) the difficulty in proving and calculating those damages; (4) the attendant risks and uncertainty of litigation, as well as the difficulties and delays inherent in such litigation including the challenges to certification of a class; (5) Defendant's vigorous defense of the litigation and continued denial of the claims contained in the Complaint; (6) the desirability of consummating the present Settlement Agreement to ensure that the Class

receives a fair and reasonable Settlement; and (7) providing Settlement Class Members prompt relief.

27. In particular, it is my opinion that the present Settlement Agreement provides significant monetary benefits to Class Members that are rationally and directly based on the kind and amount of actual harm suffered by Settlement Class Members as a result of the Data Breach.

28. As recounted in the Settlement, the class members have already received substantial benefits without having to submit claims. As to the prospective financial benefits, the Settlement affords relief to Settlement Class Members with minimal burden and through a streamlined claims process, with a claim form that is simple to complete and submit. Settlement Class Members may seek relief for their damages by filing a claim form without providing documentation to support those damages. Alternatively, Settlement Class Members with more significant damages may take the additional step to present reasonable documentation to seek greater compensation.

29. The relief provided by the Settlement is reasonable and adequate, particularly in light of the risks and delay trial and associated appeals would wreak. At bottom, Plaintiffs faced difficult hurdles certifying a class.

30. In addition, the cost of retaining a lawyer to represent a consumer in an individual litigation, along with costs associated with retaining an expert to investigate and testify as to liability, would vastly exceed any consumers' damages, making it unlikely that, absent the class mechanism, any consumer would have pursued a claim.

31. If the Parties had been unable to resolve this case through settlement, the litigation would likely have been protracted and costly. Although the Plaintiffs and Class Counsel believe that the claims asserted are meritorious, continued litigation against Defendants posed significant risks that made any recovery uncertain. At the outset, continued litigation of this matter would require the Court to resolve several, separate threshold questions concerning the viability of the litigation.

32. In light of these difficult issues, the monetary benefits of the Settlement are appropriate and the timing in which the benefits have and will be provided is significant, and go well beyond the potential litigated recovery for the class.

33. The monetary benefits of the Settlement also meet the demands in the Complaint. All Settlement Class Members received monetary benefits. These terms strongly suggest that Class benefits were not traded for individual benefits. If approved by the Court, Settlement Class Members may file a claim for reimbursement of financial or other losses suffered as a result of the Data Breach. Settlement Class Members with significant losses and who provide reasonable documentation of such losses will be eligible for a payment of up to \$2,500.00 S.A. § 11.03.

34. Further, the proposed Settlement Class is functionally equivalent to that alleged in the Complaint. The Settlement Class is defined as:

“All residents of the United States whose Personal Information was exposed or potentially exposed as a result of the Data Breach Incident.” Thus, there is harmony between both the proposed class and the claims to be released in the Complaint and Settlement.

35. It is my opinion, and that of Class Counsel, that the relief achieved through the Settlement is close to if not the same relief we would have achieved had we taken the case to trial and succeeded.

36. It is my opinion, and that of Class Counsel, that the Settlement is fair, reasonable, and adequate and that the Settlement should be given final approval.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 29, 2023 at Tampa, Florida.

By: John A. Yanchunis
John A. Yanchunis, Esq.

EXHIBIT 2

**IN THE CIRCUIT COURT OF THE
NINTH JUDICIAL CIRCUIT
IN AND FOR ORANGE COUNTY, FLORIDA**

SAUL HYMES, ILANA HARWAYNE-
GIDANSKY, EDGAR FIERRO, and JOAN
LEWIS, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

EARL ENTERPRISES HOLDINGS, INC.

Defendant.

Case No. 2021-CA-007617-O

**DECLARATION OF BRANDON
SCHWARTZ REGARDING STATUS OF
NOTICE PLAN AND SETTLEMENT
ADMINISTRATION**

I, Brandon Schwartz, declare as follows:

1. I am the Director of Notice for Postlethwaite & Netterville, APAC (“P&N”)¹, a full-service administration firm providing legal administration services, including the design, development, and implementation of unbiased complex legal notification programs.

2. In the *Declaration of Brandon Schwartz Regarding Proposed Notice Plan and Administration* (“Schwartz Declaration,”) filed on October 26, 2022 and submitted along with my C.V., I detailed the proposed Notice Plan to administer the claims process in the above-referenced matter (the “Action”)². As stated in the Schwartz Declaration, P&N designed the Notice Plan to give notice to the Class Members in the most practicable manner possible. To do so, P&N designed, and the Honorable A. James Craner approved, a multifaceted approach utilizing a combination of (1) online display, (2) social media, (3) YouTube, (4) streaming radio, (5) national press release, (6) toll-free settlement hotline, and (7) Settlement Website.

¹ As of May 21, 2023, the Directors & employees of Postlethwaite & Netterville (P&N), APAC joined EisnerAmper as EAG Gulf Coast, LLC. Where P&N is named or contracted, EAG Gulf Coast, LLC employees will service the work under those agreements. P&N’s obligations to service work may be assigned by P&N to Eisner Advisory Group, LLC or EAG Gulf Coast, LLC, or one of Eisner Advisory Group, LLC’s or EAG Gulf Coast, LLC’s subsidiaries or affiliates.

² All capitalized terms not otherwise defined in this document shall have the meaning ascribed to them in the Settlement Agreement.

3. On September 7, 2023, Judge Craner approved the Notice Plan, related notice forms, and appointed P&N as the Settlement Administrator in the *Order Certifying Settlement Class, Preliminary Approving Class Action Settlement and Directing Notice to the Settlement Class* (the “Order”).

4. In the Order, Judge Craner provisionally certified a Class defined as “[a]ll residents of the United States whose Personal Information was exposed or potentially exposed a result of the Data Breach Incident. Excluded from the Settlement Class are Defendant and any of its officers and directors; all Settlement Class Members who timely and validly request exclusion from the Settlement Class; the Judge or Magistrate Judge to whom the Litigation is assigned and, any member of those Judges’ staffs or immediate family members; and any other person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding or abetting the criminal activity or occurrence of the Data Breach Incident or who pleads *nolo contendere* to any such charge.”

5. Beginning on October 6, 2023, P&N began to implement the Notice Plan in accordance with its requirements. This declaration will discuss the implementation and status of the Notice Plan and Settlement Administration.

Notice Plan Summary

Digital Banner and Video Notice

6. Pursuant to the Order, P&N caused digital banner and video notices to run across a network of sites, Facebook, Instagram, and video notice on YouTube. Digital notices allowed website visitors to identify themselves as potential Class Members and click through to the Settlement Website. Additionally, the banner notices were translated into Spanish and appeared on language appropriate websites and/or served to users that chose Spanish as their preferred browser language. Combined, more than 314,636,714 impressions were generated during the campaign, which was 10,836,714 more than described in the Schwartz Declaration. Screenshots of the digital banner notices are attached as **Exhibit A**.

Streaming Radio

7. Pursuant to the Order, P&N caused radio notice to run via Spotify streaming radio. The radio notice was accompanied with a companion banner that may have appeared on the user's device during the airing of the radio notice. The :30-second radio and accompanying banner notices ran in English. In total, 590,269 streaming radio and companion banner impressions were generated during the campaign. The radio script and a screenshot of the companion banner notice is attached as **Exhibit B**.

Press Release

8. Pursuant to the Order, on October 9, 2023, P&N disseminated a nationwide news release over Cision's PR Newswire US1 & National Hispanic newlines in English and Spanish announcing the Settlement. The release resulted in 461 pickups by media outlets and a total potential audience of 193,000,000. A copy of the release in English and Spanish as well as the visibility report is attached as **Exhibit C**.

Settlement Website

9. On October 6, 2023, a neutral informational Settlement Website, www.EarlSettlement.com, was created to provide Class Members access to the Claim Form (online, and mail-in versions available in English and Spanish), Long Notice and Publication Notice (available in English and Spanish), Settlement Agreement, and other relevant documents. The Settlement Website also includes important dates, answers to frequently asked questions, instructions for how Class Members may opt-out (request exclusion) from or object to the Settlement, contact information for the Settlement Administrator, and provided Class Members with the ability to submit a claim using the online Claim Form and instructions. The Settlement Website also provides the date of the Final Hearing on its landing page and in multiple locations on the Settlement Website. On November 10, 2023 *Plaintiffs' Motion for Service Awards, Attorneys' Fees and Costs* was added to the Settlement Website.

10. As of December 27, 2023, the Settlement Website has received 144,096 page views from 92,686 unique visitors over 118,557 sessions.

Dedicated Toll-Free Hotline

11. On October 6, 2023, P&N also established the toll-free hotline, 1-844-976-1987, dedicated to this Settlement. The toll-free hotline is accessible 24 hours per day, seven days per week and utilizes an interactive voice response (“IVR”) system where Class Members can obtain essential information regarding the Settlement and be provided responses to frequently asked questions. Class Members have the option to leave a voicemail and receive a call back from the call center representative. The toll-free hotline appeared in the Long Notice, Publication Notice, and in multiple locations on the Settlement Website.

Email Support

12. P&N established the email address, info@EarlSettlement.com, to provide email support so Class Members could address specific questions and requests to the Settlement Administrator. The email address is included in the Long Notice and displayed on the Settlement Website.

Settlement P.O. Box

13. P&N maintains a designated P.O. Box for the administration of the Settlement: Earl Enterprises Settlement Administrator, P.O. Box 2867, Baton Rouge, LA 70821. P&N monitors the Settlement P.O. Box for Settlement-related mail such as Claim Forms, objections, exclusion requests, and inquiries about the Settlement. P&N promptly handles all mail received at the Settlement P.O. Box.

Claim Form Submissions

14. Class Members had the option of making Claims online or by sending the printed Claim Form to the Settlement Administrator. The online Claim Form feature was available on the Settlement Website beginning October 6, 2023.

15. The deadline for Claim submissions is January 5, 2024. As of December 27, 2023, P&N has received 1,911 Claim submissions after removing duplicate claims, of which 1,789 are for promotional cards and 122 are for Documented Expense Reimbursement. To date P&N has approved 11 Documented Expense Reimbursement claims for a total of \$2,929.18. P&N shall

continue to analyze Claims that have already been received as well as any additional timely Claims mailed to the P.O. Box and postmarked by the Claims Deadline.

Objections and Exclusions

16. The deadline for Class Members to ask to be excluded from the Settlement is January 5, 2024. As of December 27, 2023, P&N has received zero exclusions.

17. The Order directs Class Members to mail objections to the Clerk of the Court at the addresses set forth in the Notice. To date, P&N has not received any objections or comments from Class Members and is not aware of any objections filed with the Clerk.

Conclusion

18. In class action notice planning, execution, and analysis, we are guided by due process considerations under the United States Constitution, and by case law pertaining to the recognized notice standards under Fla R. Civ. P 1.220 and Fed. R. Civ. P. 23. This framework directs that a notice plan be optimized to reach the class and, in a settlement notice situation such as this, that the notice or notice plan itself not limit knowledge of legal rights—nor the ability to exercise other options—to class members in any way. All of these requirements were met in this case.

19. In my opinion, the above-described Notice Plan was consistent with other effective class action notice programs, achieved a minimum of 70% reach to Settlement Class Members with a minimum average frequency of 2.17.

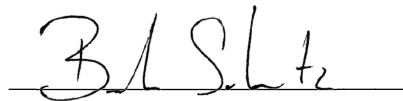
20. It is my opinion, based on my expertise and experience and that of my team, that the methods of notice dissemination implemented by this Settlement, and the Court’s Preliminary Approval Order, provided effective notice of the Settlement, provided the best notice that is practicable, adhered to Fla R. Civ. P 1.220 and Fed. R. Civ. P. 23, followed the guidance set forth in the Manual for Complex Litigation 4th Ed. and FJC guidance, and met the requirements of due process.

//

//

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 28th day of December 2023 in Portland, Oregon.

A handwritten signature in black ink, appearing to read "B. Schwartz", written over a horizontal line.

Brandon Schwartz

EXHIBIT A

Exhibit A: Digital Banner and Video Notice



15 Healthy Pantry Dinners for Hectic Weeknights

No time for grocery shopping? No problem! These 15 dietitian-approved dinners use ingredients you likely have stocked in your pantry, fridge or freezer like canned beans, pasta, eggs and leftover chicken. Now you can throw together a nutritious meal in no time that will please the family and make you look like a gourmet cook.

By: Holley Grainger, MS, RD

Related To:
Recipes



Photo By: Katie Morford, MS, RD

VIEW THE GALLERY >



LEARN MORE
If you used a credit or debit card at certain Earl Enterprises restaurants between May 2018 and March 2019, you may be eligible to receive benefits from a class action settlement.

Advertisement

1 / 15

Oven-Baked Chicken Taquitos

Dinner doesn't get much easier than this! These oven-baked chicken taquitos are made with just five ingredients and are ready in 20 minutes. This healthy spin on the traditional fried taquitos is sure to be a new family favorite. Make a double batch and freeze the extras to use for future suppers or school lunches. [Get the recipe >>](#)

MORE FROM:

Modern Family Design Lab

66° Orlando, FL

54° Westhampton,...

65° San Diego, CA

Today Hourly 10 Day Monthly Weekend Radar Video More Forecasts

Refresh - Renew - Restyle
Raymour & Flanigan

Orlando, FL As of 9:01 am EDT

66°

Fair

Day 82° • Night 63°



Watch: Firefighters Dispatched To Fiery Halloween Display

Today's Forecast for Orlando, FL

Morning

68°



0%

Afternoon

81°



0%

Evening

70°



2%

Overnight

66°



4%

Next Hours

Advertisement



If you used a credit or debit card at certain Earl Enterprises restaurants between May 2018 and March 2019, you may be eligible to receive benefits from a class action settlement.

LEARN MORE

Advertisement

Web Notifications

Breaking News & Top Stories

Stay up-to-date on the latest weather news with desktop and mobile phone notifications.

If you need help to opt in, please visit our Support Center.

It Wouldn't Be Fall Without...



Weather Today in Orlando, FL

Feels Like

66°



High / Low

82°/63°

Wind

8 mph

Humidity

57%

Dew Point

50°

If you used a credit or debit card at certain Earl Enterprises restaurants between May 2018 and March 2019, you may be eligible to receive benefits from a class action settlement. [LEARN MORE](#)



Recipes

Shows

Chefs

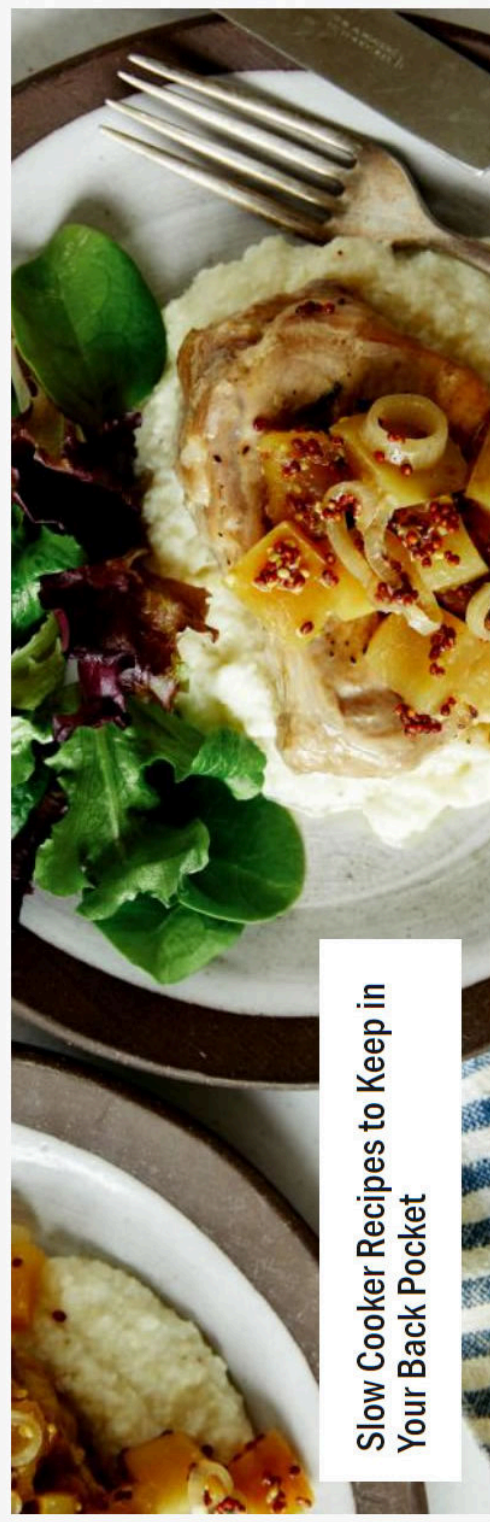
Trending

Shop

Sweepstakes

What's on TV

What are you looking for?



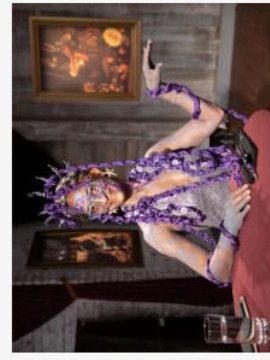
Slow Cooker Recipes to Keep in Your Back Pocket



31 FRIGHTFULLY FUN OPTIONS
Our Best Halloween Cakes, From Cute to Creepy-Crawly



CREAMY, DREAMY PERFECTION
The Easiest-Ever Upgrades for Mac + Cheese



HALLOWEEN BAKING CHAMPIONSHIP
Carla Makes Spiderweb Cookies + More Scary Treats
Tonight 9 | 8c

SCHEDULE

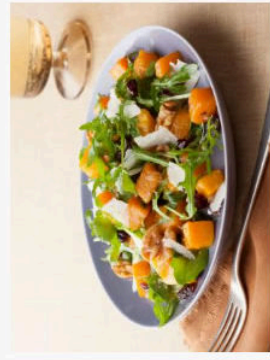
ON NOW
Delicious Miss Brown
9am | 8c
[Watch Live TV](#)

UP NEXT
Delicious Miss Brown
9:30am | 8:30c

ON TONIGHT
Halloween Baking Championship
9pm | 8c

[See Full Schedule](#)

Fall Salads That Feature the Season's Best



If you used a credit or debit card at certain Earl Enterprises restaurants between May 2018 and March 2019, you may be eligible to receive benefits from a class action settlement.

LEARN MORE

ESPN+

SUBSCRIBE NOW

- NFL PrimeTime
- NFL Turning Point
- Peyton's Places

Quick Links

- Daily Lines
- Fantasy Football
- Power Rankings
- Pigskin Pick'em
- Pigskin Win Totals
- Tickets

Favorites

- Yankees MLB
- Giants NFL
- Jets NFL
- Knicks NBA
- Rangers NHL

Manage Favorites

Podcasts

- The Mina Kimes Show
- Fantasy Focus Football
- The Bill Barnwell Show
- Behind the Bets with Doug Kezirian

Fantasy

- Football
- Baseball

Cowboys 3-2 **10** Final **42** 49ers 5-0

Dak Prescott throws INTs on three consecutive drives as Cowboys blown out by 49ers
10h

0:30
Leighton Vander Esch hurt on Jordan Mason's touchdown
9h

0:22
Kittle completes the TD hat trick with 10-yard pass from Purdy
10h

0:22
Purdy finds Kittle for touchdown No. 2 vs. Dallas
10h

0:27
Purdy finds Kittle on corner route for opening TD
10h

GAMECAST BOX SCORE

Top Headlines

- Dak: Loss to 49ers may be 'most humbling' ever
- Fired-up Jets help Hackett take revenge in Denver
- 49ers hope 4-TD night earns Purdy 'more respect'
- Jones again pulled by Belichick, but remains QB1
- Colts' Taylor says new deal a win for all NFL RBs
- Source: Colts think Richardson sprained AC joint
- Vikes unsure of Jefferson's status, 'still very early'
- Hurts authors gem in Eagles' win: 'Bailed us out'
- ESPN+ Kiper & Co.: Prospects, risers, and buzz

BREAKING DOWN WEEK 5

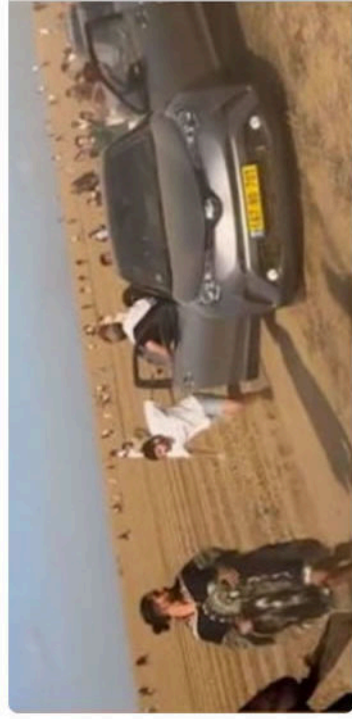
Let's overreact to NFL Week 5: Graziano on Belichick's future, Vikings' QB plans, Cowboys' kryptonite

DIRECTV stream

WITH NFL REDZONE FROM NFL NETWORK

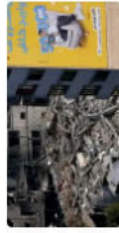
Best of ESPN+

BREAKING NEWS: U.S. confirms death of 9 Americans in Israel



260 bodies found after Hamas attack on Israeli music festival

The outdoor Nova Festival was supposed to be an all-night dance party, but as dawn broke, revelers began hearing sirens and rockets. **'We didn't even have any place to hide'**



Israel orders 'complete siege' of Gaza after Hamas attack



American Heart Association identifies new medical condition for 1st time



What Oct. snow in Siberia means for winter in the U.S.



Celebrity chef Michael Chiarello dies at 61 after allergic reaction



Israeli missile strikes Gaza building during reporter's live shot

Stories for you



World - The Telegraph

Naked woman paraded by jeering Hamas fighters

The naked body of a woman was paraded through the streets in the back of a pick-up truck on Saturday as Hamas fighters sat on her unmoving form. **5.7K** · 6 min read



World - USA TODAY

Sen. Cory Booker says he is shaken, heartbroken after taking cover in bomb shelter in Israel

Sen. Cory Booker said he and his team are safe, but they are shaken, angered, and heartbroken by the hundreds killed and thousands killed in Israel. **3.5K** · 2 min read



Opinion - Miami Herald

Two US Rabbis on Israel: This is our 9/11 | Opinion

"We hope that the world will comprehend the necessity of Israel's armed response and refrain from hasty condemnation, choosing instead to support efforts aimed at restoring peace and..." **388** · 4 min read

Trending Now

1. Dallas Cowboys
2. Columbus Day...
3. Michael Chiarello
4. 2023 United Auto...
5. Afghanistan Eart...
6. Miami Hurricanes
7. Russia-Ukraine War
8. Big Brother
9. Simone Biles
10. Powerball



LEARN MORE

If you used a credit or debit card at certain Earl Enterprises restaurants between May 2018 and March 2019, you may be eligible to receive benefits from a class action settlement.

Weather

Hampton Bays

Today	Tue	Wed	Thu
63° 45°	65° 42°	68° 40°	68° 52°

[See more](#)

Scoreboard

Trending

Yesterday	Today	Tomorrow
GB	8:15 PM EDT	LV
PHI	6:07 PM EDT	ATL
ARI	9:07 PM EDT	LAD

[See more](#)

Daily Horoscope

October 9 - You're as good as it gets when it comes to noticing details in facial expressions today. You can read friends and coworkers like...

[See more](#)

Shop the best Prime Day deals



Why wait? Save up to 75% off Crocs, CeraVe and more right now

You don't have to hold back until Oct. 10 and Oct. 11 to score some of the best October Prime Day deals at Amazon.



If you used a credit or debit card at certain Earl Enterprises restaurants between May 2018 and March 2019, you may be eligible to receive benefits from a class action settlement. [LEARN MORE](#)

- Yahoo Sports AM
- NFL Winners and Losers
- 49ers dominate Cowboys
- Rangers, Twins win ALDS Game 2
- Fantasy Booms and Busts

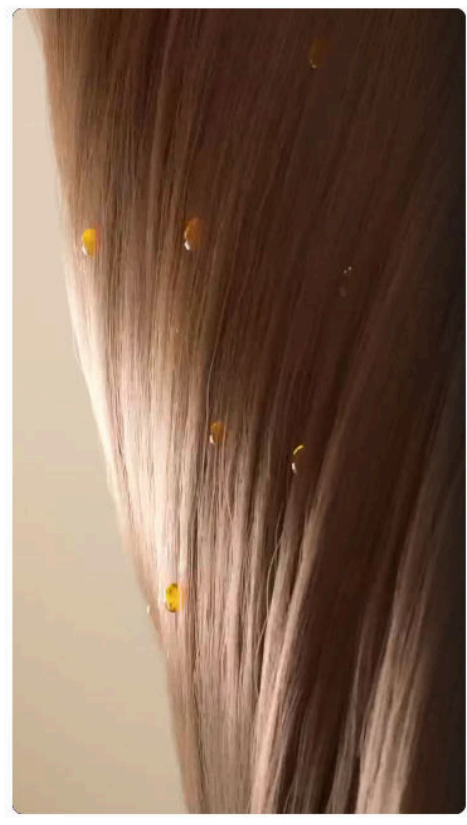
yahoo/sports

Care/Don't Care: Brock Purdy elevates 49ers offense in Week 5, with major fantasy results



Matt Harmon
Fantasy analyst
Mon, Oct 9, 2023, 12:36 AM EDT · 21 min read

21

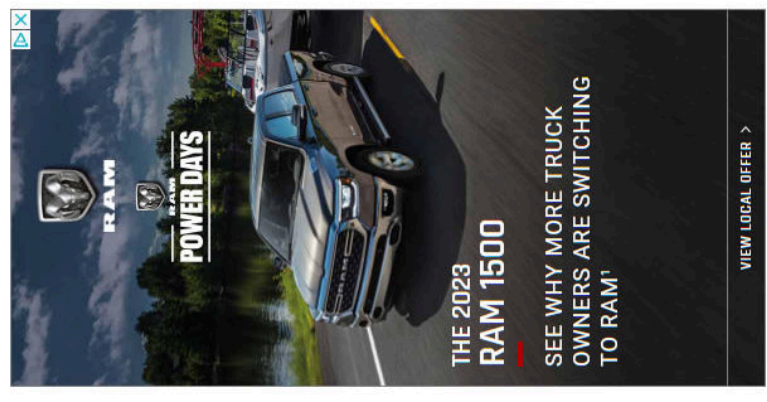


Five things I care about

[Brock Purdy elevates 49ers offense](#)

Week 5's Sunday Night Football game was billed as a game between two contenders in the NFC. What transpired on the field looked like anything but the even match many were hoping to get.

The San Francisco defense did what it always does to the Dallas offense: it put it in a headlock and never let it out. We've seen that part of the [Cowboys vs. 49ers](#) story play out multiple times over the past four seasons.





If you used a credit or debit card at certain Earl Enterprises restaurants between May 2018 and March 2019, you may be eligible to receive benefits from a class action settlement.

LEARN MORE

Health



Health · Yahoo Life

Ultra-processed foods, from pastries to decaf coffee, can harm your health. Here's how to cut back.

Nearly 60% of an adult's daily calories comes from ultra-processed foods. How bad are they for you?

6 min read



Health · Yahoo Life

Early bird vs. night owl — is one really healthier than the other? Here's what research shows.

Society often praises people who like to get up early, while night owls are often portrayed as slackers. But is it healthier to be a morning person?

4 min read

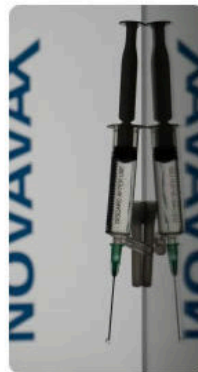


Health · Yahoo Life

Topical estrogen can help with painful sex and prevent recurring UTIs in perimenopausal and menopausal women. So why aren't more...

Experts call vaginal estrogen "the holy grail" for its effectiveness in improving vulvar or vaginal itching and burning, painful sex and recurring UTIs.

5 min read

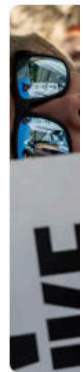


Health · Yahoo Life

Novavax's updated COVID vaccine is here. What to know about the shot.

The Novavax shot is being touted as a "traditional" alternative to Moderna and Pfizer.

4 min read



US · Yahoo Life

Kaiser Permanente patients and picketers share their strike stories:

Jeep

ADVENTURE DAYS

THE 2023 GRAND CHEROKEE

Pack the essentials and then some with impressive available towing capability

VIEW LOCAL OFFER

Jeep

Vida | Alimento



¿Quieres comprar mantequilla de nueces? Aquí tienes la opción más saludable para elegir.

FOOD Oct. 7, 2023



¿Fecha de vencimiento próxima? Aquí se explica cómo congelar y descongelar queso crema.

FOOD 7:54 a.m. ET Oct. 9



FOR SUBSCRIBERS
Elaboración de cerveza comunitaria: elevar el perfil de los entusiastas de la cerveza artesanal negra

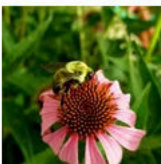
FOOD Oct. 4, 2023



Splenda es un sustituto del azúcar popular, pero ¿es seguro?

HEALTH AND WELLNESS Oct. 6, 2023

Más historias destacadas



¿Qué es la miel de Manuka? Es caro, pero quizás valga la pena intentarlo.

Manuka honey is a rare type of honey that's only created in parts of Australia and New Zealand. It contains a powerful antimicrobial agent called MGO.

HEALTH AND WELLNESS



¿Cuál es la dieta más saludable? La respuesta va más allá de la comida.

The healthiest diet is less about a strict pattern of eating and more in tune with several elements of your well-being. What you should keep in mind.

FOOD



Diez activistas menores de 17 años honrados por luchar contra la inseguridad alimentaria

Every year Hormel Foods recognizes young people who are finding innovative ways to promote a transparent, secure and more sustainable food system. Here are the

¡Es el Día Internacional del Café 2023! Celebra con el mejor café en casa
REVIEWED

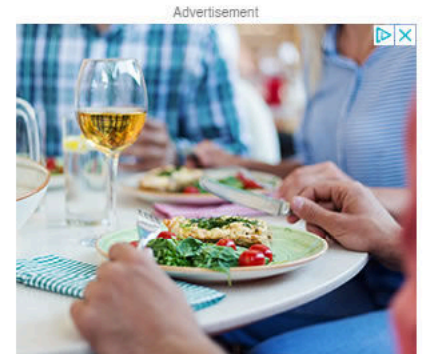
¿Cuáles son las patatas chips más saludables? Cómo mejorar tu juego de meriendas.

FOOD Oct. 2, 2023

¿Por qué cristaliza la miel? Aprenda esta sencilla solución.
HEALTH AND WELLNESS

La vuelta al cole ha llegado. A continuación se ofrecen algunas ideas para almuerzos saludables.

FOOD



Si utilizó una tarjeta de crédito o débito en ciertos restaurantes de Earl Enterprises entre mayo de 2018 y marzo de 2019, puede ser elegible para recibir beneficios de un acuerdo de demanda colectiva.

MÁS INFORMACIÓN

We're always working to improve your experience. [Let us know what you think.](#)





Si utilizó una tarjeta de crédito o débito en ciertos restaurantes de Earl Enterprises entre mayo de 2018 y marzo de 2019, puede ser elegible para recibir beneficios de un acuerdo de demanda colectiva.

MÁS INFORMACIÓN

CLIMA ACTUAL

6:20 a.m.

66°



F

RealFeel™ 65°

Nublado

MÁS DETALLES →

Calidad del aire Pobre

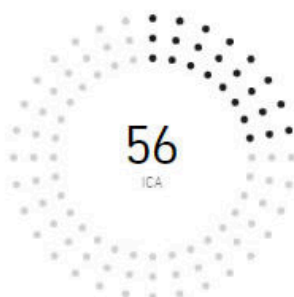
Viento NO 7 mph

Ráfagas de viento 7 mph

CALIDAD DEL AIRE ACTUAL

HOY

10/9



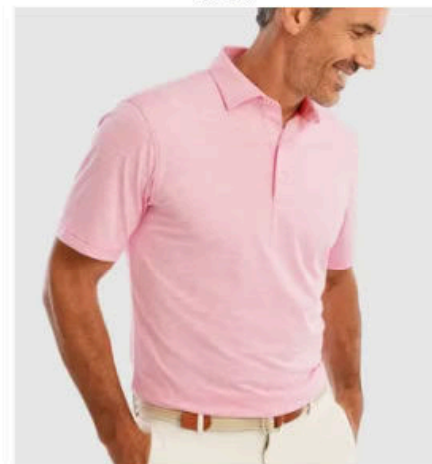
Pobre

El aire ha alcanzado un alto nivel de contaminación y no es saludable para los grupos sensibles. Reduzca el tiempo que pasa al aire libre si siente síntomas como dificultad para respirar o irritación de garganta.

Basado en contaminantes actuales

Más detalles →

Obtenga más información en



LYNDON STRIPED JE...

\$98

CLICK

Historias destacadas

HURACÁN

Golfo de México puede dar un giro con actividad tropical

hace 9 minutos



CLIMA INVERNAL

Pronóstico del invierno de EE. UU. para la temporada 2022-2024



Salud y actividades



Polvo y caspa



Presión en los senos



Correr

 **Earl Enterprises Settlement**
Sponsored · 

If you used a credit or debit card at certain Earl Enterprises restaurants between May 2018 and March 2019, you may be eligible to receive benefits from a class action settlement.

...



EARLSETTLEMENT.COM
Class Action Settlement

Learn more

1

Like

Comment

Share

Instagram



Earl Enterprises Settlement
Sponsored



[Learn more](#)



If you used a credit or debit card at certain Earl Enterprises restaurants between May 2018 and March 2019, you may be eligible to receive benefits from a class action settlement.

Earl Enterprises Settlement
 Sponsored ·

Si utilizó una tarjeta de crédito o débito en ciertos restaurantes de Earl Enterprises entre mayo de 2018 y marzo de 2019, puede ser elegible para recibir beneficios de un acuerdo de demanda colectiva.



EARLSETTLEMENT.COM
Acuerdo de Demanda Colectiva

[Learn more](#)

1

Like Comment Share

Instagram



Earl Enterprises Settlement
Sponsored



[Learn more](#)



Si utilizó una tarjeta de crédito o débito en ciertos restaurantes de Earl Enterprises entre mayo de 2018 y marzo de 2019, puede ser elegible para recibir beneficios de un acuerdo de demanda colectiva.



If so, you may be eligible to receive benefits from a data incident class action settlement if you used a credit or debit card between May 2018 and March 2019.

Affected restaurants include certain locations of Buca di Beppo, Planet Hollywood, Earl of Sandwich, Chicken Guy, Tequila Taqueria, and Mixology 101.

Earl Settlement
earlsettlement.com [Learn more](#)

Play (k) 0:25 [earlsettlement.com](#)

Skip Ad ▶



0:09 / 0:35



EXHIBIT B

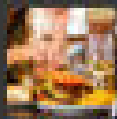
Exhibit B: Streaming Radio Notice





[LEARN MORE](#)

If you used a credit or debit card at certain Earl Enterprises restaurants between May 2018 and March 2019, you may be eligible to receive benefits from a class action settlement.



Class Action Settlement

Advertisement

0:00

-0:29



**Earl Enterprises
Data Settlement**

[Learn more](#)

30-second Radio Notice Script

If you used a credit or debit card at certain locations of Buca di Beppo, Planet Hollywood, Earl of Sandwich, Chicken Guy, Tequila Taqueria, or Mixology 101 between May 2018 and March 2019, you may be eligible to receive benefits from a data incident class action settlement.

A data incident potentially resulted in unauthorized access to credit or debit numbers, expiration dates, and, in some instances, cardholder names.

Visit EarlSettlement.com to see a list of the affected restaurant locations and file a claim if you qualify.

The deadline to file a claim is January 5, 2024.

Visit EarlSettlement.com for more information.

EXHIBIT C

Exhibit C: Press Release



If you used a credit or debit card at certain Earl Enterprises restaurants between May 2018 and March 2019, you may be eligible to receive benefits from a class action settlement. USA - English

NEWS PROVIDED BY
Earl Enterprises Settlement Administrator --
09 Oct. 2023, 08:00 ET

SHARE THIS ARTICLE
    

ORLANDO, Fla., Oct. 9, 2023 /PRNewswire/ -- The following notice is being issued by the Court approved Settlement Administrator and has been authorized by the Florida Circuit Court of the Ninth Judicial Circuit in and for Orange County, Florida, in *Hymes, et al v. Earl Enterprises Holdings, Inc.*, Case No. 2021-CA-007617-O.

A Settlement has been reached with Earl Enterprises Holdings, Inc. ("Earl Enterprises") in a class action lawsuit arising out of a data security incident reported by Earl Enterprises in March 2019, wherein certain of Earl Enterprises restaurants were the target of third-party criminal attacks involving malware variants that targeted customers' payment card information, from on or about May 23, 2018 through March 18, 2019 (the "Data Incident"). The Data Incident potentially resulted in unauthorized access to customer payment card data, such as credit and debit card numbers, expiration dates, and, in some cases, cardholder names ("Personal Information"). The Settlement includes all persons residing in the United States who made a credit or debit card purchase at any affected Earl Enterprises restaurant during the period of the Data Incident. Affected restaurants include certain locations of Buca di Beppo, Planet Hollywood, Earl of Sandwich, Chicken Guy, Tequila Taqueria, and Mixology 101. For a list of the specific affected Earl Enterprises restaurants and the exposure window of the Data Incident for each affected location, go to www.EarlSettlement.com. The Settlement provides compensation to Class Members who submit valid claims for reimbursement of up to \$5,000 for certain documented out-of-pocket expenses and lost time that were incurred as a result of the Data Incident, or two (2) restaurant promotional cards valued at \$10.00 each.

Go to www.EarlSettlement.com for detailed information about the Settlement, including a list of affected Earl Enterprises restaurants and the exposure dates for each affected location.

What Is This About?

The lawsuit claims that Earl Enterprises was responsible for the Data Incident. Earl Enterprises denies all of the claims and says it did not do anything wrong. The Court did not decide in favor of either side. Instead, both sides agreed to a settlement. This Settlement is not an admission of wrongdoing or an indication that any law was violated, and no Court has made such a determination.

Who Is Included?

You are included in the Settlement if you reside in the United States and made a credit or debit card purchase at any affected Earl Enterprises restaurant during the period of the Data Incident ("Settlement Class Members").

What Does The Settlement Provide?

The Settlement provides two types of relief to people who submit valid claims. You may submit a claim for either:

- (1) Reimbursement of up to \$5,000 for certain documented unreimbursed out-of-pocket expenses and lost time (up to 4 hours at \$20/hour) that resulted from the Data Incident and that were incurred prior to September 4, 2020; or
- (2) Compensation in the form of two (2) restaurant promotional cards valued at \$10.00 each for non-documented losses and material time taking action to deal with the repercussions of the Data Incident prior to September 4, 2020.

Earl Enterprises will also pay Court-awarded attorneys' fees, costs and expenses of up to \$195,000 and service awards of up to \$2,500 each to the Representative Plaintiffs.

How Do You Get A Payment Or Promotional Cards?

To get a payment or promotional cards, you must submit a Claim Form by **Friday, January 5, 2024**. Claim Forms are available at www.EarlSettlement.com or by calling 1-844-976-1987.

What Are Your Options?

If you do not want to be legally bound by the Settlement, you must exclude yourself from it by **Friday, January 5, 2024**, or you will not be able to sue, or continue to sue, Earl Enterprises about the legal claims this Settlement resolves. If you exclude yourself, you cannot get a payment or promotional cards from the Settlement.

If you stay in the Settlement Class, you can tell the Court that you do not agree with the Settlement or some part of it by objecting to it by **Friday, January 5, 2024**.

The Long Notice available at www.EarlSettlement.com explains how to exclude yourself or object and describes the released claims in detail.

Who Represents You?

The Court appointed John A. Yanchunis and Ryan J. McCee, of Morgan & Morgan Complex Litigation Group, Matthew M. Guiney and Carl Malmstrom of Wolf Haldenstein Adler Freeman & Herz, LLP, Mark Reich and Courtney Maccarone of Levi & Korsinsky, LLP, and Gayle M. Blatt of Casey Gerry Schenk Francavilla Blatt & Penfield, LLP, as Class Counsel to represent the Settlement Class. Class Counsel will ask the Court for an award for attorneys' fees, costs, and expenses of up to \$195,000, and service awards of up to \$2,500 each for the Representative Plaintiffs Saul Hymes, Ilana Harwayne-Cidansky, Edgar Fierro, and Joan Lewis. If you want to be represented by your own lawyer, you may hire one at your own expense.

When Will The Settlement Be Approved?

The Court will hold a hearing on Monday, February 12, 2024, at 9:30 AM to consider whether to approve the Settlement, and Class Counsel's request for attorneys' fees, costs and expenses, and service awards. You or your own lawyer may ask to appear and speak at the hearing at your own cost, but you do not have to.

Want More Information?

Visit www.EarlSettlement.com or call 1-844-976-1987.

SOURCE Earl Enterprises Settlement Administrator

Also from this source

Si utilizó una tarjeta de crédito o débito en ciertos restaurantes de Earl Enterprises entre mayo de 2018 y marzo de 2019, puede ser elegible para recibir beneficios de un acuerdo de demanda colectiva.

El siguiente aviso es emitido por el Administrador del Acuerdo aprobado por el Tribunal y ha sido autorizado por el Tribunal de Circuito de Florida.

[More Releases From This Source ->](#)

Explore



Restaurants



Retail



Hispanic



Diversity, Equity & Inclusion

[News Releases in Similar Topics ->](#)

Si utilizó una tarjeta de crédito o débito en ciertos restaurantes de Earl Enterprises entre mayo de 2018 y marzo de 2019, puede ser elegible para recibir beneficios de un acuerdo de demanda colectiva.

USA - español

NEWS PROVIDED BY
Earl Enterprises Settlement Administrator →
09 Oct. 2023, 08:00 ET

SHARE THIS ARTICLE
f x in

ORLANDO, Fla., 9 de octubre de 2023 /PRNewswire-HISPANIC PR WIRE/ -- El siguiente aviso es emitido por el Administrador del Acuerdo aprobado por el Tribunal y ha sido autorizado por el Tribunal de Circuito de Florida del Noveno Circuito Judicial en y para el Condado de Orange, Florida, en *Hymes, et al v. Earl Enterprises Holdings, Inc., Caso N° 2021-CA-007617-Q*.

Se ha alcanzado un Acuerdo con Earl Enterprises Holdings, Inc. ("Earl Enterprises") en una demanda colectiva derivada de un incidente de seguridad de datos informado por Earl Enterprises en marzo de 2019, en el que ciertos restaurantes de Earl Enterprises fueron objeto de ataques delictivos de terceros que incluyeron variantes de malware dirigidas a la información de tarjetas de pago de los clientes, desde el 23 de mayo de 2018 hasta el 18 de marzo de 2019 o alrededor de esas fechas (el "Incidente de Datos"). El Incidente de Datos pudo haber dado lugar a un acceso no autorizado a datos de tarjetas de pago de clientes, como números de tarjetas de crédito y débito, fechas de caducidad y, en algunos casos, nombres de titulares de tarjetas ("Información Personal"). El Acuerdo incluye a todas las personas residentes en los Estados Unidos que realizaron una compra con tarjeta de crédito o débito en cualquier restaurante de Earl Enterprises afectado durante el periodo del Incidente de Datos. Entre los restaurantes afectados se encuentran algunos locales de Buca di Beppo, Planet Hollywood, Earl of Sandwich, Chicken Cuy, Tequila Taquería y Mixology 101. Para consultar una lista de los restaurantes de Earl Enterprises específicos afectados y la ventana de exposición al Incidente de Datos de cada uno de ellos, visite www.EarlSettlement.com. El Acuerdo ofrece una compensación a los Miembros del Colectivo de Demandantes que presenten reclamos válidos para el reembolso de hasta \$5,000 por ciertos gastos de bolsillo documentados y tiempo perdido en los que incurrieron como consecuencia del Incidente de Datos, o dos (2) tarjetas promocionales para restaurantes por un valor de \$10.00 cada una.

Visite www.EarlSettlement.com para consultar información detallada sobre el Acuerdo, incluida una lista de los restaurantes de Earl Enterprises afectados y las fechas de exposición de cada local afectado.

¿DE QUÉ SE TRATA?

La demanda afirma que Earl Enterprises fue responsable del Incidente de Datos. Earl Enterprises niega todas las acusaciones y afirma que no ha hecho nada indebido. El Tribunal no se pronunció a favor de ninguna de las partes. En cambio, ambas partes llegaron a un acuerdo. Este Acuerdo no constituye la admisión de ningún acto ilícito ni implica que se haya infringido ninguna ley, y ningún tribunal ha dictado una resolución en ese sentido.

¿QUIÉN ESTÁ INCLUIDO?

Usted está incluido en el Acuerdo si reside en los Estados Unidos y realizó una compra con tarjeta de crédito o débito en cualquier restaurante de Earl Enterprises afectado durante el periodo del Incidente de Datos ("Miembros del Colectivo del Acuerdo").

¿QUE OFRECE EL ACUERDO?

El Acuerdo ofrece dos tipos de reparación a las personas que presenten reclamos válidos. Usted puede presentar un reclamo ya sea por:

- (1) Un reembolso de hasta \$5,000 por ciertos gastos de bolsillo documentados no reembolsados y tiempo perdido (hasta 4 horas a \$20/hora) derivados del Incidente de Datos y en los que se haya incurrido antes del 4 de septiembre de 2020, o bien
- (2) Una compensación consistente en dos (2) tarjetas promocionales para restaurantes por un valor de \$10.00 cada una por las pérdidas no documentadas y el tiempo material dedicado a adoptar medidas para hacer frente a las repercusiones del Incidente de Datos antes del 4 de septiembre de 2020.

Earl Enterprises también pagará los honorarios de abogados, costas y gastos fijados por el Tribunal por un importe de hasta \$195,000, así como pagos por retribución de servicios de hasta \$2,500 en favor de cada uno de los Demandantes Representantes.

¿CÓMO SE OBTIENE UN PAGO O TARJETAS PROMOCIONALES?

Para obtener un pago o tarjetas promocionales, debe presentar un Formulario de Reclamo antes del **viernes 5 de enero de 2024**. Los Formularios de Reclamo están disponibles en www.EarlSettlement.com o llamando al 1-844-976-1987.

¿CUÁLES SON SUS OPCIONES?

Si no desea quedar legalmente obligado por el Acuerdo, debe excluirse del mismo antes del **viernes 5 de enero de 2024**. De lo contrario, no podrá demandar o proseguir con una demanda contra Earl Enterprises en relación con los reclamos legales que resuelve este Acuerdo. Si se excluye, no podrá obtener un pago ni tarjetas promocionales del Acuerdo.

Si permanece en el Colectivo del Acuerdo, puede manifestar al Tribunal que no está conforme con el Acuerdo o con alguna parte del mismo oponiendo objeciones antes del **viernes 5 de enero de 2024**.

El Aviso Extendido disponible en www.EarlSettlement.com explica cómo excluirse u oponerse y describe en detalle los reclamos exonerados.

¿QUIÉN LO REPRESENTA?

El Tribunal designó a John A. Yanchunis y Ryan J. McGee, de Morgan & Morgan Complex Litigation Group, Matthew M. Guiney y Carl Malmstrom de Wolf Haldenstien Adler Freeman & Herz, LLP, Mark Reich y Courtney MacCarone de Levi & Korsinsky, LLP, y Gayle M. Blatt de Casey Gerry Schenk Francavilla Blatt & Penfield, LLP, como Abogados del Colectivo para que representen al Colectivo del Acuerdo. Los Abogados del Colectivo solicitarán al Tribunal el pago de hasta \$195,000 en concepto de honorarios de abogados, costas y gastos, y el pago de hasta \$2,500 en concepto de retribución por servicios en favor de los Demandantes Representantes Saul Hymes, Ilana Harwayne-Gidansky, Edgar Fierro y Joan Lewis. Si usted quiere que lo represente su propio abogado, deberá contratarlo a su costo.

¿CUÁNDO SE APROBARÁ EL ACUERDO?

El Tribunal celebrará una audiencia el lunes 12 de febrero de 2024, a las 9:30 a. m., para considerar si aprueba el Acuerdo, y la solicitud de los Abogados del Colectivo relativa a los honorarios de abogados, costas y gastos, así como el pago de retribuciones por servicios. Usted o su propio abogado pueden solicitar comparecer e intervenir en la audiencia a su propio costo, pero no están obligados a hacerlo.

¿DESEA OBTENER MÁS INFORMACIÓN?

Visite www.EarlSettlement.com o llame al 1-844-976-1987.

FUENTE: Earl Enterprises Settlement Administrator

Also from this source

If you used a credit or debit card at certain Earl Enterprises restaurants between May 2018 and March 2019, you may be eligible to receive benefits from a class action settlement.

The following notice is being issued by the Court approved Settlement Administrator and has been authorized by the Florida Circuit Court of the Ninth...

More Releases From This Source →

Explore



Restaurants



Retail



Hispanic



Diversity, Equity & Inclusion

News Releases in Similar Topics →

If you used a credit or debit card at certain Earl Enterprises restaurants between May 2018 and March 2019, you may be eligible to receive benefits from a class action settlement.

Composite

English PR Newswire ID: 3990646-1 Clear Time Oct 09, 2023 8:00 AM ET View Release ▾

Report shows data for: All 2 releases ▾

 Pickup

193M

TOTAL POTENTIAL AUDIENCE

461

TOTAL EXACT MATCHES


TOP EXACT MATCH PICKUP


 **MarketWatch**
15.2M visitors/month ^[1]

 **KTLA [Los Ang...**
6M visitors/month ^[1]

 **PR Newswire**
5.8M visitors/month ^[1]

 **WJW-TV FOX-8 ...**
5.8M visitors/month ^[1]

 **Benzinga**
4.9M visitors/month ^[1]


 **Markets Insider**
4.4M visitors/month ^[1]

 **WFLA [Tampa, FL]**
4.3M visitors/month ^[1]

 **KHNL-TV Hawai...**
3.8M visitors/month ^[1]

 **KTVK-TV IND-3...**
3M visitors/month ^[1]

 **KXAN-TV NBC-3...**
2.9M visitors/month ^[1]


 **Morningstar**
2.7M visitors/month ^[1]

 **KLAS-TV CBS-8...**
2.4M visitors/month ^[1]

 **WGN [Chicago,...**
2.3M visitors/month ^[1]

 **WSFA-TV [Mont...**
2.3M visitors/month ^[1]

 **WXIN-TV FOX-5...**
2.2M visitors/month ^[1]

*DATA SOURCES: [1]  [2] ALEXA, [3] SITEWORTHTRAFFIC.COM [4] CISION DIGITAL REACH

*THE DATA CITED HERE BY SIMILARWEB REPRESENTS SITE TRAFFIC DATA OF WORLDWIDE UNIQUE VISITORS ON DESKTOP AND MOBILE DEVICES. DATA IS UPDATED MONTHLY.

Views & Engagement

Views & Engagement data will continue to mature over time. Totals below are expected to have reached 98% maturity when the circles below are darker in color.

194
CLICK-THROUGHS

1
SHARES

6,461
RELEASE VIEWS

Distribution

961
TOTAL AP OUTLETS DISTRIBUTED

1.3K
TOTAL INFLUENCERS DISTRIBUTED

TOP AP OUTLETS

CISION INFLUENCER LISTS



C-SPAN
86.2M Visitors/Month
Washington, DC



Scribd, Inc.
43.5M Visitors/Month
San Francisco, CA



FoxNews.com
32.5M Visitors/Month
New York, NY



CBS News Radio
30M Visitors/Month
New York, NY



New York Time...
29.9M Visitors/Month
New York, NY



Apple Inc.
29.7M Visitors/Month
Cupertino, CA

CNBC.com



26.1M Visitors/Month
Englewood Cliffs, NJ

CBSnews.com
26.1M Visitors/Month
New York, NY

List Name	Outlet	Recipients
Business & Fi...	Freelancer	14
Business & Fi...	El Observador	5
Business & Fi...	The Associated Press	4
Business & Fi...	Dos Mundos	3
Business & Fi...	Hispanic Network Maga...	3
Business & Fi...	LATINA Style	3

Pickup

Overview

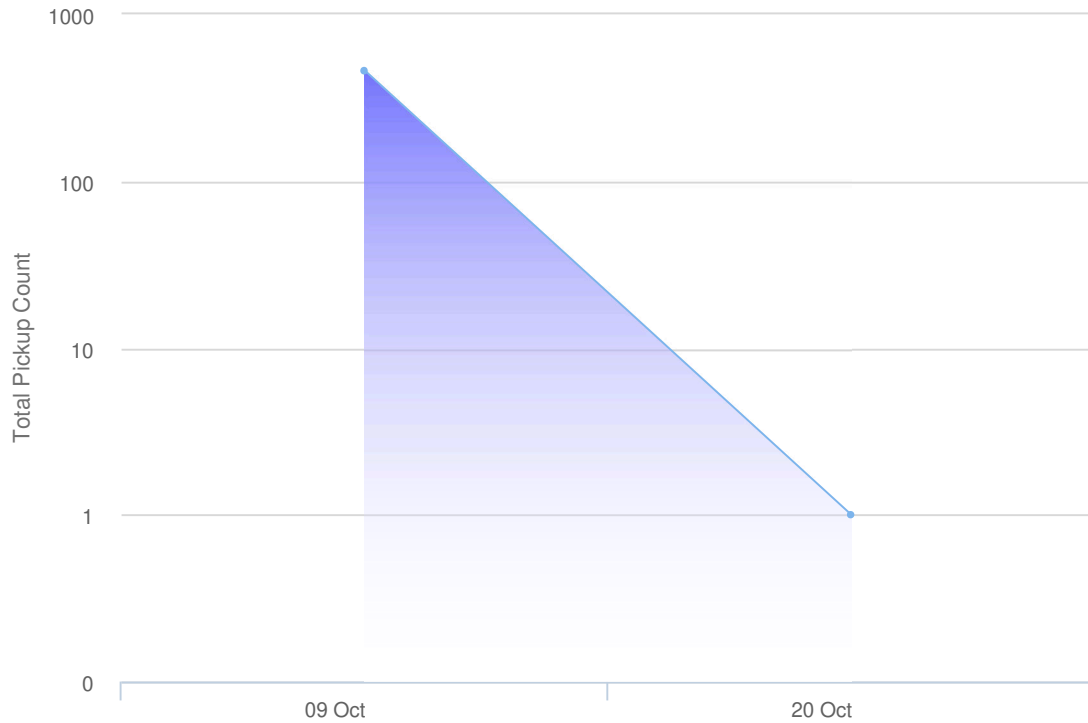
TOTAL PICKUP	461	TOTAL POTENTIAL AUDIENCE	193M
--------------	------------	--------------------------	-------------

Exact Match **461** postings

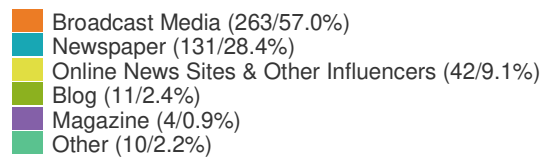
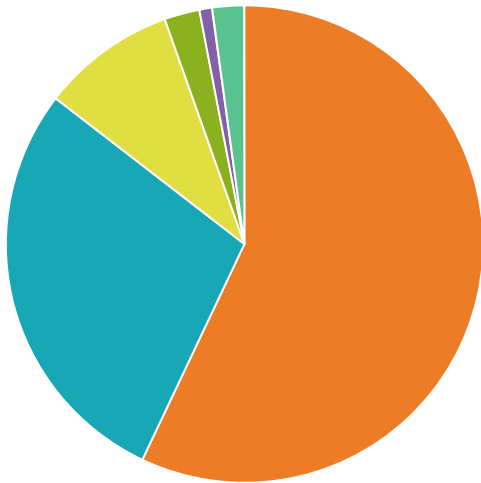
Exact Match **193M** visitors

Total Pickup Over Time

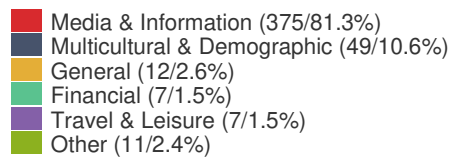
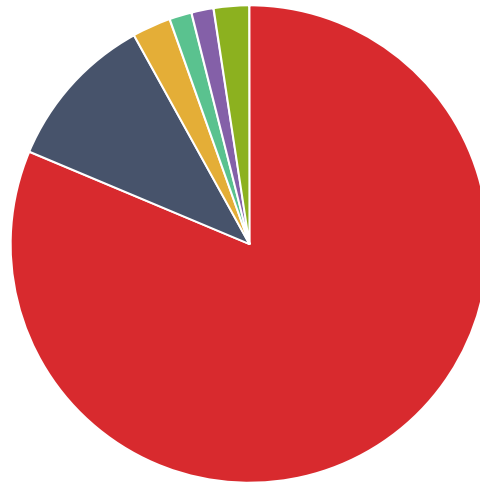
Total pickup since your content was distributed



Total Pickup by Source Type



Total Pickup by Industry









































Exact Match Pickup































Exact matches are full text postings of your content which we have found in the online and social media that we monitor. Understand how it is calculated.































Total Exact Matches: **461**





























Total Potential Audience: **192,950,239**































Logo	Outlet Name	Location	Source Type	Industry	Potential Audience
	MarketWatch Online  View Release	United States	Online News Sites & Other Influencers	Financial	15,232,070 ^[1] visitors/month
	KTLA [Los Angeles, CA] Online  View Release	United States	Broadcast Media	Media & Information	6,001,026 ^[1] visitors/month
	PR Newswire Online  View Release	Global	PR Newswire	Media & Information	5,825,737 ^[1] visitors/month
	PR Newswire Online  View Release	Global	PR Newswire	Media & Information	5,825,737 ^[1] visitors/month
	WJW-TV FOX-8 [Cleveland, OH] Online  View Release	United States	Broadcast Media	Media & Information	5,810,206 ^[1] visitors/month































	Benzinga Online  View Release	United States	Online News Sites & Other Influencers	Financial	4,876,696 ^[1] visitors/month
	Markets Insider Online  View Release	Global	Online News Sites & Other Influencers	Financial	4,362,724 ^[1] visitors/month
	WFLA [Tampa, FL] Online  View Release	United States	Broadcast Media	Media & Information	4,335,811 ^[1] visitors/month
	KHNL-TV Hawaii News Now [Honolulu, HI] Online  View Release	United States	Broadcast Media	Media & Information	3,795,334 ^[1] visitors/month
	KTVK-TV IND-3 [Phoenix, AZ] Online  View Release	United States	Broadcast Media	Media & Information	3,035,587 ^[1] visitors/month
	KXAN-TV NBC-36 [Austin, TX] Online  View Release	United States	Broadcast Media	Media & Information	2,863,889 ^[1] visitors/month
	Morningstar Online  View Release	Global	Financial Data, Research & Analytics	Financial	2,705,622 ^[1] visitors/month
	KLAS-TV CBS-8 [Las Vegas, NV] Online  View Release	United States	Broadcast Media	Media & Information	2,448,515 ^[1] visitors/month
	WGN [Chicago, IL] Online  View Release	United States	Broadcast Media	Media & Information	2,335,322 ^[1] visitors/month
	WSFA-TV [Montgomery, AL] Online  View Release	United States	Broadcast Media	Media & Information	2,289,560 ^[1] visitors/month
	WXIN-TV FOX-59 [Indianapolis, IN] Online  View Release	United States	Broadcast Media	Media & Information	2,238,185 ^[1] visitors/month
	KRON [San Francisco, CA] Online  View Release	United States	Broadcast Media	Media & Information	2,142,951 ^[1] visitors/month
	KTVI-TV FOX-2 [St. Louis, MO] Online  View Release	United States	Broadcast Media	Media & Information	2,044,366 ^[1] visitors/month
	WFMZ-TV IND-69 [Allentown, PA] Online  View Release	United States	Broadcast Media	Media & Information	1,946,682 ^[1] visitors/month































	WFMZ-TV IND-69 [Allentown, PA] Online  View Release	United States	Broadcast Media	Media & Information	1,946,682 ^[1] visitors/month
	WFSB-TV CBS-3 (Hartford, CT) Online  View Release	United States	Broadcast Media	Media & Information	1,899,346 ^[1] visitors/month
	WGHP [Greensboro, NC] Online  View Release	United States	Broadcast Media	Media & Information	1,898,201 ^[1] visitors/month
	WOIO-TV CBS-19 [Cleveland, OH] Online  View Release	United States	Broadcast Media	Media & Information	1,885,278 ^[1] visitors/month
	KSWB [San Diego, CA] Online  View Release	United States	Broadcast Media	Media & Information	1,753,563 ^[1] visitors/month
	KDVR [Denver, CO] Online  View Release	United States	Broadcast Media	Media & Information	1,750,682 ^[1] visitors/month
	KVVU-TV FOX-5 [Las Vegas, NV] Online  View Release	United States	Broadcast Media	Media & Information	1,710,186 ^[1] visitors/month
	WBTV-TV [Charlotte, NC] Online  View Release	United States	Broadcast Media	Media & Information	1,604,899 ^[1] visitors/month
	KY3-TV [Springfield, TX] Online  View Release	United States	Broadcast Media	Media & Information	1,564,641 ^[1] visitors/month
	WAVY-TV NBC-10 [Portsmouth, VA] Online  View Release	United States	Broadcast Media	Media & Information	1,503,828 ^[1] visitors/month
	KOIN-TV CBS-6 [Portland, OR] Online  View Release	United States	Broadcast Media	Media & Information	1,495,504 ^[1] visitors/month
	KFOR [Oklahoma City, OK] Online  View Release	United States	Broadcast Media	Media & Information	1,438,735 ^[1] visitors/month
	WCMH [Columbus, OH] Online  View Release	United States	Broadcast Media	Media & Information	1,411,074 ^[1] visitors/month
	WPIX-TV CW-11 [New York, NY] Online  View Release	United States	Broadcast Media	Media & Information	1,408,228 ^[1] visitors/month
	WMTV-TV NBC-15 [Madison, WI] Online  View Release	United States	Broadcast Media	Media & Information	1,406,997 ^[1] visitors/month































	WWBT-TV NBC-12 [Richmond, VA] Online  View Release	United States	Broadcast Media	Media & Information	1,369,502 ^[1] visitors/month
	WXIX-TV FOX-19 [Cincinnati, OH] Online  View Release	United States	Broadcast Media	Media & Information	1,356,012 ^[1] visitors/month
	KMOV-TV CBS-4 [St. Louis, MO] Online  View Release	United States	Broadcast Media	Media & Information	1,309,200 ^[1] visitors/month
	WHTM [Harrisburg, PA] Online  View Release	United States	Broadcast Media	Media & Information	1,294,689 ^[1] visitors/month
	KPTV-TV FOX-12 [Portland, OR] Online  View Release	United States	Broadcast Media	Media & Information	1,265,504 ^[1] visitors/month
	WDAF [Kansas City, MO] Online  View Release	United States	Broadcast Media	Media & Information	1,229,556 ^[1] visitors/month
	KTVX [Salt Lake City, UT] Online  View Release	United States	Broadcast Media	Media & Information	1,151,318 ^[1] visitors/month
	KCTV-TV CBS-11 [Colorado Springs, CO] Online  View Release	United States	Broadcast Media	Media & Information	1,122,912 ^[1] visitors/month
	KCRG-TV ABC-9 [Cedar Rapids, IA] Online  View Release	United States	Broadcast Media	Media & Information	1,118,870 ^[1] visitors/month
	KHON [Honolulu, HI] Online  View Release	United States	Broadcast Media	Media & Information	1,085,445 ^[1] visitors/month
	KCTV-TV CBS-5 [Kansas City, MO] Online  View Release	United States	Broadcast Media	Media & Information	1,084,941 ^[1] visitors/month
	KRQE [Albuquerque, NM] Online  View Release	United States	Broadcast Media	Media & Information	1,067,473 ^[1] visitors/month
	WRIC [Richmond, VA] Online  View Release	United States	Broadcast Media	Media & Information	1,043,779 ^[1] visitors/month
	WGCL-TV CBS 46 [Atlanta, GA] Online  View Release	United States	Broadcast Media	Media & Information	1,043,707 ^[1] visitors/month
	WKBN-TV CBS-27 [Youngstown, OH] Online  View Release	United States	Broadcast Media	Media & Information	1,034,643 ^[1] visitors/month































	WBAY-TV [Green Bay, WI] Online  View Release	United States	Broadcast Media	Media & Information	1,032,394 ^[1] visitors/month
	WOOD [Grand Rapids, MI] Online  View Release	United States	Broadcast Media	Media & Information	1,026,921 ^[1] visitors/month
	WATE [Knoxville, TN] Online  View Release	United States	Broadcast Media	Media & Information	1,021,010 ^[1] visitors/month
	WBRC-TV [Birmingham, AL] Online  View Release	United States	Broadcast Media	Media & Information	1,019,072 ^[1] visitors/month
	WCSC-TV CBS-5 [Charleston, SC] Online  View Release	United States	Broadcast Media	Media & Information	985,492 ^[1] visitors/month
	WNCN [Raleigh, NC] Online  View Release	United States	Broadcast Media	Media & Information	972,788 ^[1] visitors/month
	WAFB-TV [Midland, TX] Online  View Release	United States	Broadcast Media	Media & Information	963,464 ^[1] visitors/month
	WTNH [New Haven, CT] Online  View Release	United States	Broadcast Media	Media & Information	962,940 ^[1] visitors/month
	WSMV-TV NBC 4 [Nashville, TN] Online  View Release	United States	Broadcast Media	Media & Information	947,461 ^[1] visitors/month
	WKRN [Nashville, TN] Online  View Release	United States	Broadcast Media	Media & Information	935,551 ^[1] visitors/month
	WWSB-TV ABC-7 [Sarasota, FL] Online  View Release	United States	Broadcast Media	Media & Information	932,877 ^[1] visitors/month
	WSAZ-TV [Huntington, WV] Online  View Release	United States	Broadcast Media	Media & Information	924,824 ^[1] visitors/month
	WILX-TV [Lansing, MI] Online  View Release	United States	Broadcast Media	Media & Information	905,850 ^[1] visitors/month
	WVUE-TV FOX-8 [New Orleans, LA] Online  View Release	United States	Broadcast Media	Media & Information	905,307 ^[1] visitors/month































	WOWT-TV [Omaha, NE] Online  View Release	United States	Broadcast Media	Media & Information	890,461 ^[1] visitors/month
	WREG [Memphis, TN] Online  View Release	United States	Broadcast Media	Media & Information	888,511 ^[1] visitors/month
	KWTX-TV [Waco, TX] Online  View Release	United States	Broadcast Media	Media & Information	868,653 ^[1] visitors/month
	KWCH-TV [Wichita, KS] Online  View Release	United States	Broadcast Media	Media & Information	852,619 ^[1] visitors/month
	WPRI/WNAC [Providence, RI] Online  View Release	United States	Broadcast Media	Media & Information	838,784 ^[1] visitors/month
	WITN-TV [Greenville, NC] Online  View Release	United States	Broadcast Media	Media & Information	836,249 ^[1] visitors/month
	WDBJ7-TV [Roanoke, VA] Online  View Release	United States	Broadcast Media	Media & Information	809,662 ^[1] visitors/month
	WISTV-TV [Columbia, SC] Online  View Release	United States	Broadcast Media	Media & Information	794,457 ^[1] visitors/month
	WAVE-TV [Louisville, KY] Online  View Release	United States	Broadcast Media	Media & Information	791,208 ^[1] visitors/month
	WHNT [Huntsville, AL] Online  View Release	United States	Broadcast Media	Media & Information	789,943 ^[1] visitors/month
	WQRF/WTVO [Rockford, IL] Online  View Release	United States	Broadcast Media	Media & Information	788,822 ^[1] visitors/month
	KBTX-TV News 3 [Bryan, TX] Online  View Release	United States	Broadcast Media	Media & Information	761,233 ^[1] visitors/month
	KOLN-TV [Lincoln, NE] Online  View Release	United States	Broadcast Media	Media & Information	757,660 ^[1] visitors/month
	KTUU-TV [Anchorage, AK] Online  View Release	United States	Broadcast Media	Media & Information	750,432 ^[1] visitors/month
	WCJB-TV [Gainesville, FL] Online  View Release	United States	Broadcast Media	Media & Information	749,191 ^[1] visitors/month































	WTVG-TV ABC-13 [Toledo, OH] Online  View Release	United States	Broadcast Media	Media & Information	743,830 ^[1] visitors/month
	KOSA-TV CBS-7 [Odessa, TX] Online  View Release	United States	Broadcast Media	Media & Information	726,508 ^[1] visitors/month
	WECT-TV [Wilmington, NC] Online  View Release	United States	Broadcast Media	Media & Information	715,294 ^[1] visitors/month
	WHNS-TV FOX [Greenville, SC] Online  View Release	United States	Broadcast Media	Media & Information	689,845 ^[1] visitors/month
	WVLT-TV [Knoxville, TN] Online  View Release	United States	Broadcast Media	Media & Information	674,502 ^[1] visitors/month
	WKYT-TV [Lexington, KY] Online  View Release	United States	Broadcast Media	Media & Information	670,414 ^[1] visitors/month
	WROC/WUHF/WZDX [Rochester, NY] Online  View Release	United States	Broadcast Media	Media & Information	669,331 ^[1] visitors/month
	WFRV [Green Bay, WI] Online  View Release	United States	Broadcast Media	Media & Information	660,082 ^[1] visitors/month
	WLBT-TV [Jackson, MS] Online  View Release	United States	Broadcast Media	Media & Information	652,363 ^[1] visitors/month
	WWLP-TV NBC-22 [Springfield, MA] Online  View Release	United States	Broadcast Media	Media & Information	646,155 ^[1] visitors/month
	WEAU-TV [Eau Claire, WI] Online  View Release	United States	Broadcast Media	Media & Information	636,237 ^[1] visitors/month
	WANE [Fort Wayne, IN] Online  View Release	United States	Broadcast Media	Media & Information	631,270 ^[1] visitors/month
	WIBW-TV [Topeka, KS] Online  View Release	United States	Broadcast Media	Media & Information	626,645 ^[1] visitors/month
	WBRE/WYOU [Wilkes-Barre, PA] Online  View Release	United States	Broadcast Media	Media & Information	622,067 ^[1] visitors/month
	WJHL-TV/ABC Tri-Cities [Johnson City, TN] Online  View Release	United States	Broadcast Media	Media & Information	615,549 ^[1] visitors/month































	WMBF-TV [Myrtle Beach, SC] Online  View Release	United States	Broadcast Media	Media & Information	592,411 ^[1] visitors/month
	WIVB [Buffalo, NY] Online  View Release	United States	Broadcast Media	Media & Information	589,846 ^[1] visitors/month
	WCAX-TV [South Burlington, VT] Online  View Release	United States	Broadcast Media	Media & Information	565,386 ^[1] visitors/month
	KOLO-TV [Reno, NV] Online  View Release	United States	Broadcast Media	Media & Information	564,876 ^[1] visitors/month
	WKRG [Mobile, AL] Online  View Release	United States	Broadcast Media	Media & Information	561,813 ^[1] visitors/month
	WALB-TV [Albany, GA] Online  View Release	United States	Broadcast Media	Media & Information	552,060 ^[1] visitors/month
	KLTV-TV [Tyler, TX] Online  View Release	United States	Broadcast Media	Media & Information	545,229 ^[1] visitors/month
	KELO [Sioux Falls, SD] Online  View Release	United States	Broadcast Media	Media & Information	534,498 ^[1] visitors/month
	KTTT NBC-10 [Rochester, MN] Online  View Release	United States	Broadcast Media	Media & Information	532,181 ^[1] visitors/month
	KVLY-TV [Fargo, ND] Online  View Release	United States	Broadcast Media	Media & Information	529,265 ^[1] visitors/month
	WCTV-TV [Tallahassee, FL] Online  View Release	United States	Broadcast Media	Media & Information	525,996 ^[1] visitors/month
	KTXL [Sacramento, CA] Online  View Release	United States	Broadcast Media	Media & Information	522,582 ^[1] visitors/month
	WLOX-TV [Biloxi, MS] Online  View Release	United States	Broadcast Media	Media & Information	521,789 ^[1] visitors/month
	WTEN/ WXXA-TV [Albany, NY] Online  View Release	United States	Broadcast Media	Media & Information	508,648 ^[1] visitors/month
	KFYR-TV [Bismarck, ND] Online  View Release	United States	Broadcast Media	Media & Information	505,459 ^[1] visitors/month































	WNDU-TV [South Bend, IN] Online  View Release	United States	Broadcast Media	Media & Information	503,220 ^[1] visitors/month
	WYMT-TV [Hazard, KY] Online  View Release	United States	Broadcast Media	Media & Information	493,101 ^[1] visitors/month
	WTOC-TV [Savannah, GA] Online  View Release	United States	Broadcast Media	Media & Information	491,946 ^[1] visitors/month
	KCBD-TV [Lubbock, TX] Online  View Release	United States	Broadcast Media	Media & Information	487,627 ^[1] visitors/month
	WRDW-TV [Augusta, GA] Online  View Release	United States	Broadcast Media	Media & Information	483,560 ^[1] visitors/month
	WSPA/WYCW [Spartanburg, SC] Online  View Release	United States	Broadcast Media	Media & Information	479,667 ^[1] visitors/month
	KOLD-TV [Tucson, AZ] Online  View Release	United States	Broadcast Media	Media & Information	469,606 ^[1] visitors/month
	KWQC-TV [Davenport, IA] Online  View Release	United States	Broadcast Media	Media & Information	468,083 ^[1] visitors/month
	KSNW [Wichita, KS] Online  View Release	United States	Broadcast Media	Media & Information	466,736 ^[1] visitors/month
	WLNS-TV CBS-6 [Lansing, MI] Online  View Release	United States	Broadcast Media	Media & Information	464,889 ^[1] visitors/month
	WALA-TV FOX 10 [Mobile, AB] Online  View Release	United States	Broadcast Media	Media & Information	458,038 ^[1] visitors/month
	WTRF [Wheeling, WV] Online  View Release	United States	Broadcast Media	Media & Information	455,038 ^[1] visitors/month
	KSEE/KGPE [Fresno, CA] Online  View Release	United States	Broadcast Media	Media & Information	450,697 ^[1] visitors/month
	WFIE-TV NBC-14 [Evansville, IN] Online  View Release	United States	Broadcast Media	Media & Information	448,812 ^[1] visitors/month
	WBOY [Clarksburg, WV] Online  View Release	United States	Broadcast Media	Media & Information	447,678 ^[1] visitors/month































	KSLA-TV [Shreveport, LA] Online  View Release	United States	Broadcast Media	Media & Information	431,422 ^[1] visitors/month
	Mundiario Online  View Release	Spain	Newspaper	Media & Information	431,383 ^[1] visitors/month
	KETK-TV FOX-51 [Tyler, TX] Online  View Release	United States	Broadcast Media	Media & Information	426,773 ^[1] visitors/month
	WTAJ [Altoona, PA] Online  View Release	United States	Broadcast Media	Media & Information	420,984 ^[1] visitors/month
	KOTA-TV [Rapid City, SD] Online  View Release	United States	Broadcast Media	Media & Information	416,277 ^[1] visitors/month
	KSNT-TV NBC-27 [Topeka, KS] Online  View Release	United States	Broadcast Media	Media & Information	413,486 ^[1] visitors/month
	WHO-TV NBC-13 [Des Moines, IA] Online  View Release	United States	Broadcast Media	Media & Information	409,019 ^[1] visitors/month
	WAFF-TV [Huntsville, AL] Online  View Release	United States	Broadcast Media	Media & Information	405,421 ^[1] visitors/month
	KPLC-TV [Lake Charles, LA] Online  View Release	United States	Broadcast Media	Media & Information	403,620 ^[1] visitors/month
	KAIT-TV [Jonesboro, AR] Online  View Release	United States	Broadcast Media	Media & Information	403,074 ^[1] visitors/month
	KGET [Bakersfield, CA] Online  View Release	United States	Broadcast Media	Media & Information	402,212 ^[1] visitors/month
	WMBD-TV CBS 31 / WYZZ-TV FOX 43 [Peoria, IL] Online  View Release	United States	Broadcast Media	Media & Information	397,119 ^[1] visitors/month
	KARK-TV NBC-4 [Little Rock, AR] Online  View Release	United States	Broadcast Media	Media & Information	390,652 ^[1] visitors/month
	WOWK-TV CBS-13 [Charleston, WV] Online  View Release	United States	Broadcast Media	Media & Information	385,547 ^[1] visitors/month
	WHSV-TV [Harrisonburg, VA] Online  View Release	United States	Broadcast Media	Media & Information	379,318 ^[1] visitors/month































	WIAT [Birmingham, AL] Online  View Release	United States	Broadcast Media	Media & Information	376,586 ^[1] visitors/month
	KSFY-TV [Sioux Falls, SD] Online  View Release	United States	Broadcast Media	Media & Information	371,843 ^[1] visitors/month
	WJZY-TV FOX-46 [Charlotte, NC] Online  View Release	United States	Broadcast Media	Media & Information	367,162 ^[1] visitors/month
	WSAW-TV [Wausau, WI] Online  View Release	United States	Broadcast Media	Media & Information	361,085 ^[1] visitors/month
	WJHG-TV [Panama City Beach, FL] Online  View Release	United States	Broadcast Media	Media & Information	358,752 ^[1] visitors/month
	WBTW [Myrtle Beach, SC] Online  View Release	United States	Broadcast Media	Media & Information	339,054 ^[1] visitors/month
	WTVY-TV [Dothan, AL] Online  View Release	United States	Broadcast Media	Media & Information	326,095 ^[1] visitors/month
	WAGM-TV [Presque Isle, ME] Online  View Release	United States	Broadcast Media	Media & Information	325,440 ^[1] visitors/month
	KOLR/KOZL [Springfield, MO] Online  View Release	United States	Broadcast Media	Media & Information	318,355 ^[1] visitors/month
	WDTN/WBDT [Dayton, OH] Online  View Release	United States	Broadcast Media	Media & Information	317,342 ^[1] visitors/month
	KTSM [El Paso, TX] Online  View Release	United States	Broadcast Media	Media & Information	316,012 ^[1] visitors/month
	WCBD-TV NBC-2 [Charleston, SC] Online  View Release	United States	Broadcast Media	Media & Information	313,148 ^[1] visitors/month
	WJTV-TV CBS-12 [Jackson, MS] Online  View Release	United States	Broadcast Media	Media & Information	312,687 ^[1] visitors/month
	KNWA/KFTA [Fayetteville, AR] Online  View Release	United States	Broadcast Media	Media & Information	312,443 ^[1] visitors/month
	WNCT [Greenville, NC] Online  View Release	United States	Broadcast Media	Media & Information	308,166 ^[1] visitors/month































	WNEM-TV CBS-5 [Saginaw, MI] Online  View Release	United States	Broadcast Media	Media & Information	308,093 ^[1] visitors/month
	WABI-TV [Bangor, ME] Online  View Release	United States	Broadcast Media	Media & Information	306,722 ^[1] visitors/month
	KAMC/KLBK Online  View Release	United States	Broadcast Media	Media & Information	301,707 ^[1] visitors/month
	WSYR-TV ABC-9 NewsChannel [Syracuse, NY] Online  View Release	United States	Broadcast Media	Media & Information	301,161 ^[1] visitors/month
	KFVS-TV [Cape Girardeau, MO] Online  View Release	United States	Broadcast Media	Media & Information	288,988 ^[1] visitors/month
	KLFY [Lafayette, LA] Online  View Release	United States	Broadcast Media	Media & Information	280,322 ^[1] visitors/month
	KVEO-TV CBS-4 [Harlingen, TX] Online  View Release	United States	Broadcast Media	Media & Information	277,371 ^[1] visitors/month
	WWNY-TV [Watertown, NY] Online  View Release	United States	Broadcast Media	Media & Information	276,321 ^[1] visitors/month
	WSAV [Savannah, GA] Online  View Release	United States	Broadcast Media	Media & Information	274,214 ^[1] visitors/month
	KGNS-TV NBC/ABC/Telemundo-8 [Laredo, TX] Online  View Release	United States	Broadcast Media	Media & Information	263,916 ^[1] visitors/month
	WDVM-TV IND-25 [Washington, DC] Online  View Release	United States	Broadcast Media	Media & Information	260,900 ^[1] visitors/month
	WETM-TV NBC-18 [Elmira, NY] Online  View Release	United States	Broadcast Media	Media & Information	260,445 ^[1] visitors/month
	WGGB-TV FOX-6 / ABC-40 / CBS-3 [Springfield, MA] Online  View Release	United States	Broadcast Media	Media & Information	259,339 ^[1] visitors/month
	WJBF [Augusta, GA] Online  View Release	United States	Broadcast Media	Media & Information	253,316 ^[1] visitors/month
	WBNG-TV NEWS 12 [Binghamton, NY] Online  View Release	United States	Broadcast Media	Media & Information	251,226 ^[1] visitors/month































	KXMA/KXMB [Bismark, ND] Online  View Release	United States	Broadcast Media	Media & Information	245,650 ^[1] visitors/month
	WEEK-TV 25 News Now [East Peoria, IL] Online  View Release	United States	Broadcast Media	Media & Information	245,019 ^[1] visitors/month
	KXII-TV [Sherman, TX] Online  View Release	United States	Broadcast Media	Media & Information	244,287 ^[1] visitors/month
	WIFR-TV [Rockford, IL] Online  View Release	United States	Broadcast Media	Media & Information	244,234 ^[1] visitors/month
	WLUC-TV [Negaunee, MI] Online  View Release	United States	Broadcast Media	Media & Information	243,756 ^[1] visitors/month
	KTAL-TV NBC-6 [Shreveport, LA] Online  View Release	United States	Broadcast Media	Media & Information	242,646 ^[1] visitors/month
	KXRM [Colorado Springs, CO] Online  View Release	United States	Broadcast Media	Media & Information	242,465 ^[1] visitors/month
	WCIA-TV CBS 3 [Champaign, IL] Online  View Release	United States	Broadcast Media	Media & Information	241,894 ^[1] visitors/month
	WTVM-TV [Columbus, GA] Online  View Release	United States	Broadcast Media	Media & Information	240,671 ^[1] visitors/month
	KBJR-TV NBC-6 [Duluth, MN] Online  View Release	United States	Broadcast Media	Media & Information	237,333 ^[1] visitors/month
	WMBB-TV ABC-13 [Panama City, FL] Online  View Release	United States	Broadcast Media	Media & Information	235,703 ^[1] visitors/month
	WJET-TV ABC-24 / WFXP-TV FOX-44 [Erie, PA] Online  View Release	United States	Broadcast Media	Media & Information	219,074 ^[1] visitors/month
	KALB-TV [Alexandria, LA] Online  View Release	United States	Broadcast Media	Media & Information	210,519 ^[1] visitors/month
	WRBL [Columbus, GA] Online  View Release	United States	Broadcast Media	Media & Information	208,807 ^[1] visitors/month
	WVIR-TV NBC-29 [Charlottesville, VA] Online  View Release	United States	Broadcast Media	Media & Information	206,184 ^[1] visitors/month































	WTKO-TV [Meridian, MS] Online  View Release	United States	Broadcast Media	Media & Information	202,924 ^[1] visitors/month
	KNOE-TV [Monroe, LA] Online  View Release	United States	Broadcast Media	Media & Information	195,817 ^[1] visitors/month
	WGNO [New Orleans, LA] Online  View Release	United States	Broadcast Media	Media & Information	194,427 ^[1] visitors/month
	WDTV-TV [Bridgeport, WV] Online  View Release	United States	Broadcast Media	Media & Information	192,006 ^[1] visitors/month
	WVNS [Beckley, WV] Online  View Release	United States	Broadcast Media	Media & Information	182,426 ^[1] visitors/month
	KSNB-TV [Hastings, NE] Online  View Release	United States	Broadcast Media	Media & Information	180,327 ^[1] visitors/month
	KMVT-TV News-11 / KSVT-14 FOX [Twin Falls, ID] Online  View Release	United States	Broadcast Media	Media & Information	176,587 ^[1] visitors/month
	WTAP-TV [Parkersburg, WV] Online  View Release	United States	Broadcast Media	Media & Information	172,561 ^[1] visitors/month
	WGEM-TV NBC-10 [Quincy, IL] Online  View Release	United States	Broadcast Media	Media & Information	171,627 ^[1] visitors/month
	KFDX-TV NBC-3 / KJTL-TV FOX-18 [Wichita Falls, TX] Online  View Release	United States	Broadcast Media	Media & Information	171,098 ^[1] visitors/month
	KTAB/KRBC [Abilene, TX] Online  View Release	United States	Broadcast Media	Media & Information	170,307 ^[1] visitors/month
	WDAM-TV [Moselle, MS] Online  View Release	United States	Broadcast Media	Media & Information	163,343 ^[1] visitors/month
	KSNF/KODE [Joplin, MO] Online  View Release	United States	Broadcast Media	Media & Information	161,261 ^[1] visitors/month
	KTIV-TV NBC-4 [Sioux City, IA] Online  View Release	United States	Broadcast Media	Media & Information	159,006 ^[1] visitors/month
	KLRT-TV FOX-16 [Little Rock, AR] Online  View Release	United States	Broadcast Media	Media & Information	157,310 ^[1] visitors/month































	KFDA-TV [Amarillo, TX] Online  View Release	United States	Broadcast Media	Media & Information	155,527 ^[1] visitors/month
	KKCO-TV NBC-11 [Grand Junction, CO] Online  View Release	United States	Broadcast Media	Media & Information	153,569 ^[1] visitors/month
	WBGH/WIVT [Binghamton, NY] Online  View Release	United States	Broadcast Media	Media & Information	151,325 ^[1] visitors/month
	KLST/KSAN [San Angelo, TX] Online  View Release	United States	Broadcast Media	Media & Information	148,716 ^[1] visitors/month
	Myhighplains Online  View Release	United States	Broadcast Media	Media & Information	145,209 ^[1] visitors/month
	KIAH [Houston, TX] Online  View Release	United States	Broadcast Media	Media & Information	143,798 ^[1] visitors/month
	WTTV [Indianapolis, IN] Online  View Release	United States	Broadcast Media	Media & Information	143,323 ^[1] visitors/month
	KTRE-TV [Pollok, TX] Online  View Release	United States	Broadcast Media	Media & Information	141,756 ^[1] visitors/month
	WBKO-TV [Bowling Green, KY] Online  View Release	United States	Broadcast Media	Media & Information	139,417 ^[1] visitors/month
	KCAU-TV ABC-9 Siouxland Proud [Sioux City, IA] Online  View Release	United States	Broadcast Media	Media & Information	133,405 ^[1] visitors/month
	KARD/KTVE [West Monroe, LA] Online  View Release	United States	Broadcast Media	Media & Information	133,064 ^[1] visitors/month
	WEHT/WTWV [Evansville, IN] Online  View Release	United States	Broadcast Media	Media & Information	131,529 ^[1] visitors/month
	WVLA [Baton Rouge, LA] Online  View Release	United States	Broadcast Media	Media & Information	131,278 ^[1] visitors/month
	The Selma Times-Journal Online  View Release	United States	Newspaper	Media & Information	130,355 ^[1] visitors/month
	QuadCities WHBF-TV CBS-4 / KLJB-TV FOX-18 [Rock Island, IL] Online  View Release	United States	Broadcast Media	Media & Information	129,388 ^[1] visitors/month































	KSWO-TV [Lawton, OK] Online  View Release	United States	Broadcast Media	Media & Information	127,759 ^[1] visitors/month
	WTWO-TV NBC-2/WAWV-TV ABC-38 MyWabashValley [Terre Haute IN] Online  View Release	United States	Broadcast Media	Media & Information	122,968 ^[1] visitors/month
	WFXR [Roanoke, VA] Online  View Release	United States	Broadcast Media	Media & Information	115,984 ^[1] visitors/month
	Salisbury Post Online  View Release	United States	Newspaper	Media & Information	113,079 ^[1] visitors/month
	KGWN-TV CBS-5 [Cheyenne, WY] Online  View Release	United States	Broadcast Media	Media & Information	109,907 ^[1] visitors/month
	WPTA-TV Fort Wayne's NBC [Fort Wayne, IN] Online  View Release	United States	Broadcast Media	Media & Information	107,546 ^[1] visitors/month
	KEYC-TV [North Mankato, MN] Online  View Release	United States	Broadcast Media	Media & Information	106,736 ^[1] visitors/month
	WVVA NBC-6 [Bluefield, WV] Online  View Release	United States	Broadcast Media	Media & Information	91,042 ^[1] visitors/month
	WDKY-TV FOX-56 [Lexington, KY] Online  View Release	United States	Broadcast Media	Media & Information	88,424 ^[1] visitors/month
	WDHN-TV ABC [Webb, AL] Online  View Release	United States	Broadcast Media	Media & Information	84,482 ^[1] visitors/month
	WFFF-TV FOX 44 / WVNY-TV ABC-22 [Colchester, VT] Online  View Release	United States	Broadcast Media	Media & Information	84,254 ^[1] visitors/month
	Magnolia State Live Online  View Release	United States	Newspaper	Media & Information	82,249 ^[1] visitors/month
	Valdosta Daily Times [Valdosta, GA] Online  View Release	United States	Newspaper	Media & Information	81,450 ^[1] visitors/month
	KWKT-TV FOX-44 / KYLE-TV MyNetworkTV [Woodway, TX] Online  View Release	United States	Broadcast Media	Media & Information	75,774 ^[1] visitors/month
	One News Page Global Edition Online  View Release	Global	Online News Sites & Other Influencers	Media & Information	75,388 ^[1] visitors/month































	One News Page Global Edition Online  View Release	Global	Online News Sites & Other Influencers	Media & Information	75,388 ^[1] visitors/month
	KREX/KFQX/KGJT [Grand Junction, CO] Online  View Release	United States	Broadcast Media	Media & Information	74,161 ^[1] visitors/month
	KJCT-TV ABC-8 [Grand Junction, CO] Online  View Release	United States	Broadcast Media	Media & Information	71,873 ^[1] visitors/month
	KDAF-TV CW-33 [Dallas, TX] Online  View Release	United States	Broadcast Media	Media & Information	64,816 ^[1] visitors/month
	The Farmville Herald Online  View Release	United States	Newspaper	Media & Information	63,803 ^[1] visitors/month
	Shelby County Reporter Online  View Release	United States	Newspaper	Media & Information	63,016 ^[1] visitors/month
	KMID/KPEJ [Odessa, TX] Online  View Release	United States	Broadcast Media	Media & Information	63,007 ^[1] visitors/month
	Port Arthur News Online  View Release	United States	Newspaper	Media & Information	62,585 ^[1] visitors/month
	Natchez Democrat Online  View Release	United States	Newspaper	Media & Information	61,617 ^[1] visitors/month
	LaGrange Daily News Online  View Release	United States	Newspaper	Media & Information	58,193 ^[1] visitors/month
	The Vicksburg Post Online  View Release	United States	Newspaper	Media & Information	56,900 ^[1] visitors/month
	The Coastland Times Online  View Release	United States	Newspaper	Media & Information	53,318 ^[1] visitors/month
	American Press Online  View Release	United States	Newspaper	Media & Information	52,854 ^[1] visitors/month
	Albert Lea Tribune [Albert Lea, MN] Online  View Release	United States	Newspaper	Media & Information	52,602 ^[1] visitors/month
	WJMN-TV CBS 3 [Escanaba, WI] Online  View Release	United States	Broadcast Media	Media & Information	50,943 ^[1] visitors/month































	WYTV-TV ABC-33 [Youngstown, OH] Online  View Release	United States	Broadcast Media	Media & Information	49,113 ^[1] visitors/month
	KEVN-TV [Rapid City, SD] Online  View Release	United States	Broadcast Media	Media & Information	47,402 ^[1] visitors/month
	L'Observateur Online  View Release	United States	Newspaper	Media & Information	43,712 ^[1] visitors/month
	Elizabethton Star Online  View Release	United States	Newspaper	Media & Information	42,614 ^[1] visitors/month
	The Troy Messenger Online  View Release	United States	Newspaper	Media & Information	39,949 ^[1] visitors/month
	Daily Leader Online  View Release	United States	Newspaper	Media & Information	39,936 ^[1] visitors/month
	Picayune Item Online  View Release	United States	Newspaper	Media & Information	39,533 ^[1] visitors/month
	Alexander City Outlook Online  View Release	United States	Newspaper	Media & Information	39,225 ^[1] visitors/month
	KTVF/KXDF-TV [Fairbanks, AK] Online  View Release	United States	Broadcast Media	Media & Information	39,105 ^[1] visitors/month
	KYOU-TV [Ottumwa, IA] Online  View Release	United States	Broadcast Media	Media & Information	38,740 ^[1] visitors/month
	Leader Publications Online  View Release	United States	Newspaper	Media & Information	38,613 ^[1] visitors/month
	KNOP-TV [North Platte, NE] Online  View Release	United States	Broadcast Media	Media & Information	38,301 ^[1] visitors/month
	WPHL [Philadelphia, PA] Online  View Release	United States	Broadcast Media	Media & Information	35,297 ^[1] visitors/month
	Austin Daily Herald Online  View Release	United States	Newspaper	Media & Information	35,240 ^[1] visitors/month
	The Oxford Eagle Online  View Release	United States	Newspaper	Media & Information	34,531 ^[1] visitors/month































	Portal de Financas Online  View Release	Brazil	Online News Sites & Other Influencers	Financial	33,400 ^[1] visitors/month
	Washington Daily News Online  View Release	United States	Newspaper	Media & Information	32,936 ^[1] visitors/month
	WWTI-TV ABC-50 [Watertown, NY] Online  View Release	United States	Broadcast Media	Media & Information	30,392 ^[1] visitors/month
	Boreal Community Media Online  View Release	United States	Newspaper	Media & Information	30,233 ^[1] visitors/month
	The Andalusia Star-News Online  View Release	United States	Newspaper	Media & Information	29,556 ^[1] visitors/month
	CreditRiskMonitor Online  View Release	United States	Financial Data, Research & Analytics	Financial	28,737 ^[1] visitors/month
	The Suffolk News-Herald Online  View Release	United States	Newspaper	Media & Information	28,041 ^[1] visitors/month
	Ironton Tribune Online  View Release	United States	Newspaper	Media & Information	27,032 ^[1] visitors/month
	The Advocate-Messenger Online  View Release	United States	Newspaper	Media & Information	26,804 ^[1] visitors/month
	CNYhomepage Online  View Release	United States	Broadcast Media	Media & Information	26,265 ^[1] visitors/month
	KHMT/KSVI [Billings, MT] Online  View Release	United States	Broadcast Media	Media & Information	25,764 ^[1] visitors/month
	WNTZ [Alexandria, LA] Online  View Release	United States	Broadcast Media	Media & Information	23,571 ^[1] visitors/month
	The State Journal Online  View Release	United States	Newspaper	Media & Information	21,336 ^[1] visitors/month
	Davie County Enterprise Record Online  View Release	United States	Newspaper	Media & Information	21,257 ^[1] visitors/month
	Winchester Sun Online  View Release	United States	Newspaper	Media & Information	21,163 ^[1] visitors/month































	<p>Quiz Me Online  View Release</p>	United States	Online News Sites & Other Influencers	General	21,160 ^[1] visitors/month
	<p>Orange Leader Online  View Release</p>	United States	Newspaper	Media & Information	21,037 ^[1] visitors/month
	<p>The Roanoke Chowan News Herald Online  View Release</p>	United States	Newspaper	Media & Information	20,901 ^[1] visitors/month
	<p>The Stanly News & Press Online  View Release</p>	United States	Newspaper	Media & Information	19,966 ^[1] visitors/month
	<p>WLAX-TV FOX 28/45 [La Crosse, WI] Online  View Release</p>	United States	Broadcast Media	Media & Information	18,786 ^[1] visitors/month
	<p>Mega TV Online  View Release</p>	United States	Broadcast Media	Multicultural & Demographic	18,596 ^[1] visitors/month
	<p>WPGX-TV FOX-28 [Panama City, FL] Online  View Release</p>	United States	Broadcast Media	Media & Information	17,298 ^[1] visitors/month
	<p>The Tryon Daily Bulletin Online  View Release</p>	United States	Newspaper	Media & Information	16,223 ^[1] visitors/month
	<p>Smithfield Times Online  View Release</p>	United States	Newspaper	Media & Information	15,616 ^[1] visitors/month
	<p>Valley Times-News Online  View Release</p>	United States	Newspaper	Media & Information	15,227 ^[1] visitors/month
	<p>Americus Times-Recorder Online  View Release</p>	United States	Newspaper	Media & Information	14,677 ^[1] visitors/month
	<p>The Atmore Advance Online  View Release</p>	United States	Newspaper	Media & Information	13,150 ^[1] visitors/month
	<p>Luverne Journal Online  View Release</p>	United States	Newspaper	Media & Information	13,136 ^[1] visitors/month
	<p>WTNZ FOX-43 (Knoxville, TN) Online  View Release</p>	United States	Broadcast Media	Media & Information	13,095 ^[1] visitors/month
	<p>WLUS 98.3 FM [Clarksville, VA] Online  View Release</p>	United States	Broadcast Media	Media & Information	11,618 ^[1] visitors/month































	Sangri Times Online  View Release	India	Online News Sites & Other Influencers	General	11,018 ^[1] visitors/month
	La Nueva 94 FM Online  View Release	Puerto Rico	Broadcast Media	Multicultural & Demographic	10,798 ^[1] visitors/month
	The Bogalusa Daily News Online  View Release	United States	Newspaper	Media & Information	10,523 ^[1] visitors/month
	KNEP-TV NBC-4 [Scottsbluff, NE] Online  View Release	United States	Broadcast Media	Media & Information	9,779 ^[1] visitors/month
	Gaming and Leisure Online  View Release	United States	Trade Publications	Travel & Leisure	9,519 ^[1] visitors/month
	The Tidewater News Online  View Release	United States	Newspaper	Media & Information	9,486 ^[1] visitors/month
	WMC-TV Action News 5 [Memphis, TN] Online  View Release	United States	Broadcast Media	Media & Information	9,420 ^[1] visitors/month
	Jessamine Journal Online  View Release	United States	Newspaper	Media & Information	9,398 ^[1] visitors/month
	The Wetumpka Herald Online  View Release	United States	Newspaper	Media & Information	9,084 ^[1] visitors/month
	The Post-Searchlight Online  View Release	United States	Newspaper	Media & Information	8,961 ^[1] visitors/month
	El Zol 106.7 FM Online  View Release	United States	Broadcast Media	Multicultural & Demographic	8,130 ^[1] visitors/month
	The Clanton Advertiser Online  View Release	United States	Newspaper	Media & Information	6,568 ^[1] visitors/month
	The Demopolis Times Online  View Release	United States	Newspaper	Media & Information	6,106 ^[1] visitors/month
	The Clemmons Courier Online  View Release	United States	Newspaper	Media & Information	6,061 ^[1] visitors/month
	La Zeta 93.7 FM Online  View Release	Puerto Rico	Broadcast Media	Multicultural & Demographic	6,033 ^[1] visitors/month































	The Brewton Standard Online  View Release	United States	Newspaper	Media & Information	5,771 ^[1] visitors/month
	Middlesboro News Online  View Release	United States	Newspaper	Media & Information	5,714 ^[1] visitors/month
	Cordele Dispatch Online  View Release	United States	Newspaper	Media & Information	5,656 ^[1] visitors/month
	Energía, Industria, Comercio y Minería Online  View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	5,517 ^[1] visitors/month
	Hoy en Delaware Online  View Release	United States	Newspaper	Multicultural & Demographic	5,323 ^[1] visitors/month
	Hoy en Delaware Online  View Release	United States	Newspaper	Multicultural & Demographic	5,323 ^[1] visitors/month
	Alabama Now Online  View Release	United States	Newspaper	Media & Information	5,211 ^[1] visitors/month
	Times of San Diego Online  View Release	United States	Newspaper	Media & Information	4,913 ^[1] visitors/month
	The Interior Journal Online  View Release	United States	Newspaper	Media & Information	4,801 ^[1] visitors/month
	NewsBlaze US Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	4,716 ^[1] visitors/month
	Beauregard News Online  View Release	United States	Newspaper	Media & Information	4,709 ^[1] visitors/month
	The Tallahassee Tribune Online  View Release	United States	Newspaper	Media & Information	4,705 ^[1] visitors/month
	Play 96.5 FM Online  View Release	Puerto Rico	Broadcast Media	Multicultural & Demographic	4,692 ^[1] visitors/month
	The Greenville Advocate Online  View Release	United States	Newspaper	Media & Information	4,579 ^[1] visitors/month
	La Prensa Hispana Online  View Release	United States	Newspaper	Multicultural & Demographic	4,308 ^[1] visitors/month































	La Prensa Hispana Online  View Release	United States	Newspaper	Multicultural & Demographic	4,308 ^[1] visitors/month
	The Panolian Online  View Release	United States	Newspaper	Media & Information	4,160 ^[1] visitors/month
	Latin Business Today Online  View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	3,998 ^[1] visitors/month
	Latin Business Today Online  View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	3,998 ^[1] visitors/month
	Latin Business Hoy Online  View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	3,998 ^[1] visitors/month
	US Times Mirror Online  View Release	United States	Online News Sites & Other Influencers	General	3,943 ^[1] visitors/month
	BocaLista Online  View Release	Puerto Rico	Online News Sites & Other Influencers	Multicultural & Demographic	3,916 ^[1] visitors/month
	Zeta 92.3 FM Online  View Release	United States	Broadcast Media	Multicultural & Demographic	3,877 ^[1] visitors/month
	Univision Kansas City Online  View Release	United States	Broadcast Media	Multicultural & Demographic	3,837 ^[1] visitors/month
	La Raza 93.3 FM Online  View Release	United States	Broadcast Media	Multicultural & Demographic	3,659 ^[1] visitors/month
	Draper Journal Online  View Release	United States	Newspaper	Media & Information	3,638 ^[1] visitors/month
	Diario Horizonte - CT Online  View Release	United States	Newspaper	Multicultural & Demographic	3,570 ^[1] visitors/month
	Windsor Weekly Online  View Release	United States	Newspaper	Media & Information	3,455 ^[1] visitors/month
	Claiborne Progress Online  View Release	United States	Newspaper	Media & Information	3,280 ^[1] visitors/month
	Herriman Journal Online  View Release	United States	Newspaper	Media & Information	3,095 ^[1] visitors/month





























	KJUN-TV / KFOL-TV HTV10 [Houma, LA] Online  View Release	United States	Broadcast Media	Media & Information	2,718 ^[1] visitors/month
	La Ley 107.9 FM Online  View Release	United States	Broadcast Media	Multicultural & Demographic	2,600 ^[1] visitors/month
	Ismael Cala Online  View Release	United States	Blog	Multicultural & Demographic	2,306 ^[1] visitors/month
	Leesville Leader Online  View Release	United States	Newspaper	Media & Information	1,418 ^[1] visitors/month
	El Lider USA Online  View Release	United States	Newspaper	Multicultural & Demographic	1,360 ^[1] visitors/month
	Prentiss Headlight Online  View Release	United States	Newspaper	Media & Information	1,186 ^[1] visitors/month
	The Podcast Park Online  View Release	United States	Broadcast Media	Media & Information	1,151 ^[1] visitors/month
	WMPW 105.9 FM [Danville, VA] Online  View Release	United States	Broadcast Media	Media & Information	1,129 ^[1] visitors/month
	The Charlotte Gazette Online  View Release	United States	Newspaper	Media & Information	1,127 ^[1] visitors/month
	Omaha Magazine Online  View Release	United States	Newspaper	Media & Information	927 ^[1] visitors/month
	Kenbridge Victoria Dispatch Online  View Release	United States	Newspaper	Media & Information	900 ^[1] visitors/month
	Prensa Mexicana Online  View Release	United States	Newspaper	Multicultural & Demographic	886 ^[1] visitors/month
	Southern Sports Today Online  View Release	United States	Broadcast Media	Media & Information	795 ^[1] visitors/month
	WCNN 680 AM / 93.7 FM [Atlanta, GA] Online  View Release	United States	Broadcast Media	Media & Information	790 ^[1] visitors/month
	Ahora News (New Jersey) Online  View Release	United States	Newspaper	Multicultural & Demographic	772 ^[1] visitors/month





























	My Silly Little Gang Online  View Release	United States	Blog-Parental Influencers	Retail & Consumer	742 ^[1] visitors/month
	WHLF 95.3 FM [South Boston, VA] Online  View Release	United States	Broadcast Media	Media & Information	668 ^[1] visitors/month
	Network Today Online  View Release	United States	Online News Sites & Other Influencers	Policy & Public Interest	656 ^[1] visitors/month
	Southwest Daily News Online  View Release	United States	Newspaper	Media & Information	621 ^[1] visitors/month
	Bluegrass Live Online  View Release	United States	Newspaper	Media & Information	618 ^[1] visitors/month
	USA Times Online  View Release	United States	Online News Sites & Other Influencers	General	589 ^[1] visitors/month
	WWZW-FM Classic story96.7 [Lexington, VA] Online  View Release	United States	Broadcast Media	Media & Information	549 ^[1] visitors/month
	SEGUROS, SALUD, PENSIONES & SEGURIDAD Online  View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	548 ^[1] visitors/month
	WSHV 96.7 FM [South Hill, VA] Online  View Release	United States	Broadcast Media	Media & Information	537 ^[1] visitors/month
	El Colombiano Online  View Release	United States	Newspaper	Multicultural & Demographic	534 ^[1] visitors/month
	ChineseWire Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	528 ^[1] visitors/month
	BambuUP Online  View Release	Vietnam	Blog	Financial	520 ^[1] visitors/month
	South Salt Lake Journal Online  View Release	United States	Newspaper	Media & Information	512 ^[1] visitors/month
	Grit Daily Online  View Release	United States	Newspaper	General	489 ^[1] visitors/month
	KMLK 98.7-FM [El Dorado, AR] Online  View Release	United States	Broadcast Media	Media & Information	488 ^[1] visitors/month































	Coastal Today Magazine Online  View Release	United States	Magazine	Travel & Leisure	473 ^[1] visitors/month
	Midvale Journal Online  View Release	United States	Newspaper	Media & Information	451 ^[1] visitors/month
	WKSK 101.9 FM [South Boston, VA] Online  View Release	United States	Broadcast Media	Media & Information	451 ^[1] visitors/month
	Washington City Paper [Washington, DC] Online  View Release	United States	Newspaper	General	411 ^[1] visitors/month
	Time Bulletin USA Online  View Release	United States	Online News Sites & Other Influencers	General	406 ^[1] visitors/month
	Medway & Millis News Online  View Release	United States	Newspaper	Media & Information	383 ^[1] visitors/month
	WVDN 104.5 FM [Danville, VA] Online  View Release	United States	Broadcast Media	Media & Information	368 ^[1] visitors/month
	Walnut Creek Magazine Online  View Release	United States	Newspaper	Media & Information	339 ^[1] visitors/month
	La Familia de Broward Online  View Release	United States	Magazine	Multicultural & Demographic	332 ^[1] visitors/month
	Bonita & Estero Magazine Online  View Release	United States	Newspaper	Media & Information	327 ^[1] visitors/month
	RSW Living Magazine [Sanibel, FL] Online  View Release	United States	Newspaper	Media & Information	320 ^[1] visitors/month
	Columbia Business Monthly Online  View Release	United States	Newspaper	Media & Information	309 ^[1] visitors/month
	American Talk Online  View Release	United States	Online News Sites & Other Influencers	General	307 ^[1] visitors/month
	WFOM 106.3 FM / 1230 AM [Atlanta, GA] Online  View Release	United States	Broadcast Media	Media & Information	297 ^[1] visitors/month
	Univision Minnesota Online  View Release	United States	Broadcast Media	Multicultural & Demographic	295 ^[1] visitors/month





















	Mystery Shopping Teacher Online  View Release	United States	Blog	Retail & Consumer	291 ^[1] visitors/month
	Chester County Press Online  View Release	United States	Newspaper	Media & Information	286 ^[1] visitors/month
	Franklin Town News Online  View Release	United States	Newspaper	Media & Information	282 ^[1] visitors/month
	La Voz Hispanic News [Pasco, WA] Online  View Release	United States	Newspaper	Multicultural & Demographic	280 ^[1] visitors/month
	WZZS-FM 106.9 La Número Uno / WTMY-AM 1280 La Número Uno Online  View Release	United States	Broadcast Media	Multicultural & Demographic	280 ^[1] visitors/month
	Show Continental Online  View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	277 ^[1] visitors/month
	ChicaNOL Online  View Release	United States	Blog	Multicultural & Demographic	269 ^[1] visitors/month
	Cape Coral Living Magazine Online  View Release	United States	Newspaper	Media & Information	269 ^[1] visitors/month
	Vida Nueva Online  View Release	United States	Newspaper	Multicultural & Demographic	265 ^[1] visitors/month
	South Jordan Journal Online  View Release	United States	Newspaper	Media & Information	262 ^[1] visitors/month
	El Perico Online  View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	262 ^[1] visitors/month
	El Perico Online  View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	262 ^[1] visitors/month
	Ismael Cala Foundation Online  View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	260 ^[1] visitors/month
	Harlan Enterprise Online  View Release	United States	Newspaper	Media & Information	249 ^[1] visitors/month
	Times of the Islands Online  View Release	United States	Newspaper	Media & Information	246 ^[1] visitors/month


	Gulf & Main Magazine Online  View Release	United States	Newspaper	Media & Information	243 ^[1] visitors/month
	Taos News Online  View Release	United States	Newspaper	Media & Information	234 ^[1] visitors/month
	Jewish Link Online  View Release	United States	Newspaper	Media & Information	232 ^[1] visitors/month
	Business Class News Online  View Release	United States	Blog	Media & Information	223 ^[1] visitors/month
	Gaby Natale Online  View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	222 ^[1] visitors/month
	Kasi Broadcasting Online  View Release	South Africa	News & Information Service	Business Services	219 ^[1] visitors/month
	Thrills Taste Travels Online  View Release	United States	Blog	Travel & Leisure	218 ^[1] visitors/month
	EstilosBlog Online  View Release	United States	Blog	Multicultural & Demographic	216 ^[1] visitors/month
	Lowndes Signal Online  View Release	United States	Newspaper	Media & Information	212 ^[1] visitors/month
	Rivers of Living Water Mission - Home Page Online  View Release	United States	Information Website	Travel & Leisure	208 ^[1] visitors/month
	Buenos Dias Nebraska Online  View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	201 ^[1] visitors/month
	Sandy Journal Online  View Release	United States	Newspaper	Media & Information	186 ^[1] visitors/month
	Geovanny Vicente Romero Online  View Release	United States	Blog	Multicultural & Demographic	179 ^[1] visitors/month
	Geovanny Vicente Romero Online  View Release	United States	Blog	Multicultural & Demographic	179 ^[1] visitors/month
	Mi Ciudad Tampa Bay Online  View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	175 ^[1] visitors/month

	Hola Arkansas! Online  View Release	United States	Newspaper	Multicultural & Demographic	173 ^[1] visitors/month
	Natick Town News Online  View Release	United States	Newspaper	Media & Information	169 ^[1] visitors/month
	Transporte, Logística & Comercio Internacional Online  View Release	United States	Newspaper	Multicultural & Demographic	167 ^[1] visitors/month
	Home Improvement Magazine Online  View Release	United States	Online News Sites & Other Influencers	Retail & Consumer	166 ^[1] visitors/month
	Univision Canada Online  View Release	Canada	Broadcast Media	Multicultural & Demographic	163 ^[1] visitors/month
	Ashland Town News Online  View Release	United States	Newspaper	Media & Information	161 ^[1] visitors/month
	Hot News Alerts Online  View Release	United States	Online News Sites & Other Influencers	General	161 ^[1] visitors/month
	Style Magazine Online  View Release	United States	Newspaper	Media & Information	158 ^[1] visitors/month
	Industry News Online  View Release	United States	Online News Sites & Other Influencers	General	139 ^[1] visitors/month
	Fayetteville Connect Online  View Release	United States	Newspaper	Media & Information	130 ^[1] visitors/month
	TripCast360 Online  View Release	United States	Online News Sites & Other Influencers	Travel & Leisure	128 ^[1] visitors/month
	TripCast360 Online  View Release	United States	Online News Sites & Other Influencers	Travel & Leisure	128 ^[1] visitors/month
	Inspired Foodery Online  View Release	United States	Blog	Food/Beverage	128 ^[1] visitors/month
	Bradfordville Bugle Online  View Release	United States	Newspaper	Media & Information	126 ^[1] visitors/month

	City Journals Online  View Release	United States	Newspaper	Media & Information	123 ^[1] visitors/month
	Holladay Journal Online  View Release	United States	Newspaper	Media & Information	123 ^[1] visitors/month
	Mahalsa US Online  View Release	United States	Online News Sites & Other Influencers	General	116 ^[1] visitors/month
	Forefront Media News Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	115 ^[1] visitors/month
	Cheap Fun Things To Do Online  View Release	United States	Online News Sites & Other Influencers	Travel & Leisure	115 ^[1] visitors/month
	Tactics Magazine for Shopping Centers Online  View Release	Canada	Trade Publications	Retail & Consumer	115 ^[1] visitors/month
	Tactics Magazine for Shopping Centers Online  View Release	Canada	Trade Publications	Retail & Consumer	115 ^[1] visitors/month
	Society Magazine Online  View Release	United States	Online News Sites & Other Influencers	General	112 ^[1] visitors/month
	Legal Magazine Online  View Release	United States	Online News Sites & Other Influencers	Legal	112 ^[1] visitors/month
	TeleNews Online  View Release	United States	Online News Sites & Other Influencers	Multicultural & Demographic	111 ^[1] visitors/month
	The Chillicothe Hometown Voice Online  View Release	United States	Newspaper	Media & Information	109 ^[1] visitors/month
	Davis Journal Online  View Release	United States	Newspaper	Media & Information	108 ^[1] visitors/month
	Gates County Index Online  View Release	United States	Newspaper	Media & Information	103 ^[1] visitors/month
	South Valley Journal Online  View Release	United States	Newspaper	Media & Information	103 ^[1] visitors/month

	Norwood Town News Online  View Release	United States	Newspaper	Media & Information	103 ^[1] visitors/month
	Norfolk & Wrentham News Online  View Release	United States	Newspaper	Media & Information	103 ^[1] visitors/month
	Hopedale Town News Online  View Release	United States	Newspaper	Media & Information	103 ^[1] visitors/month
	Holliston Town News Online  View Release	United States	Newspaper	Media & Information	103 ^[1] visitors/month
	Greenville Business Magazine Online  View Release	United States	Newspaper	Media & Information	103 ^[1] visitors/month
	WPTM 102.3-FM [Weldon, NC] Online  View Release	United States	Broadcast Media	Media & Information	98 ^[1] visitors/month
	WNC Business Online  View Release	United States	Newspaper	Media & Information	77 ^[1] visitors/month
	West Jordan Journal Online  View Release	United States	Newspaper	Media & Information	70 ^[1] visitors/month
	The Pioneer Online  View Release	United States	Newspaper	Media & Information	70 ^[1] visitors/month
	Millcreek Journal Online  View Release	United States	Newspaper	Media & Information	65 ^[1] visitors/month
	West Valley City Journal Online  View Release	United States	Newspaper	Media & Information	64 ^[1] visitors/month
	MB News Online  View Release	United States	Newspaper	Media & Information	64 ^[1] visitors/month
	Cottonwood Heights Journal Online  View Release	United States	Newspaper	Media & Information	64 ^[1] visitors/month
	Toti.com Online  View Release	United States	Newspaper	Media & Information	63 ^[1] visitors/month
	Taylorville Journal Online  View Release	United States	Newspaper	Media & Information	58 ^[1] visitors/month

	Sugar House Journal Online  View Release	United States	Newspaper	Media & Information	58 ^[1] visitors/month
	Murray Journal Online  View Release	United States	Newspaper	Media & Information	58 ^[1] visitors/month
	Hattiesburg.com Online  View Release	United States	Online News Sites & Other Influencers	Media & Information	58 ^[1] visitors/month
	Starmetier Online  View Release	United States	Online News Sites & Other Influencers	Business Services	57 ^[1] visitors/month
	Starmetier Online  View Release	United States	Online News Sites & Other Influencers	Business Services	57 ^[1] visitors/month
	SuperLatina TV Online  View Release	United States	Blog	Multicultural & Demographic	Not Available
	Connect Iredell Online  View Release	United States	Newspaper	Media & Information	Not Available
	WZSP-FM 105.3 La Zeta [Nocatee, FL] Online  View Release	United States	Broadcast Media	Multicultural & Demographic	Not Available
	Revista MUJERES Internacional Online  View Release	United States	Magazine	Multicultural & Demographic	Not Available
	Revista MUJERES Internacional Online  View Release	United States	Magazine	Multicultural & Demographic	Not Available

*Data sources:  [2] Alexa, [3] siteworthtraffic.com [4] Cision Digital Reach [1]

*The data cited here by SimilarWeb represents site traffic data of worldwide unique visitors on desktop and mobile devices. Data is updated monthly.

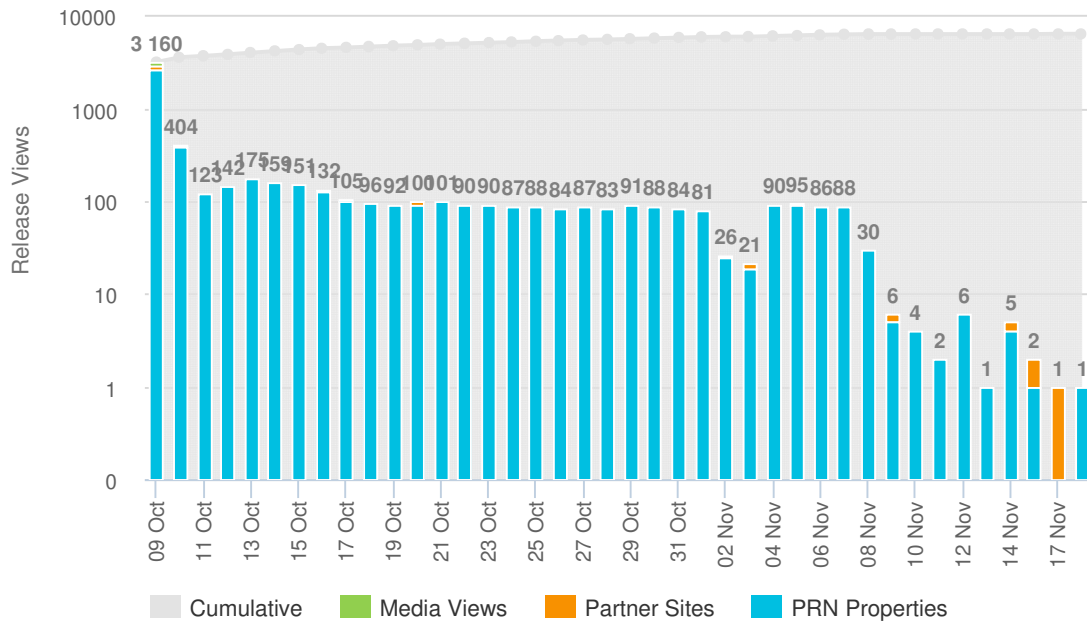
Traffic

Overview

RELEASE VIEWS & HITS	7K	MULTIMEDIA	0
Release Views	6.5K		
Media Views	273		
Public Views	6.2K		
Partner Sites	393		
PR Newswire Properties	5.8K		
Release Web Crawler Hits	490		

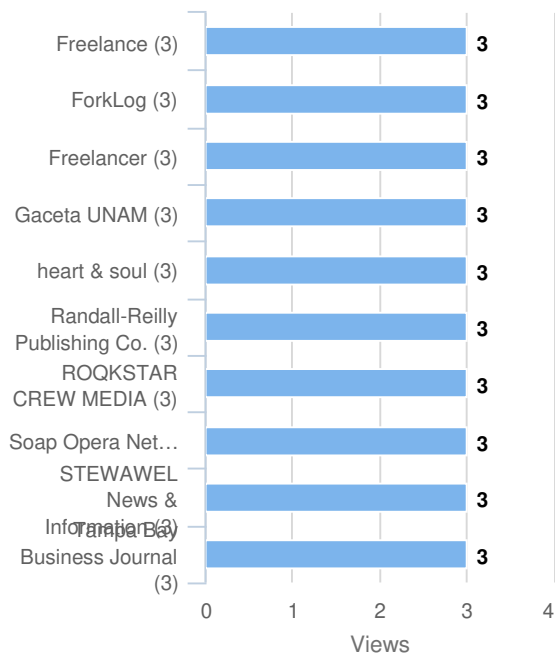
Release Views

Release Views Over Time



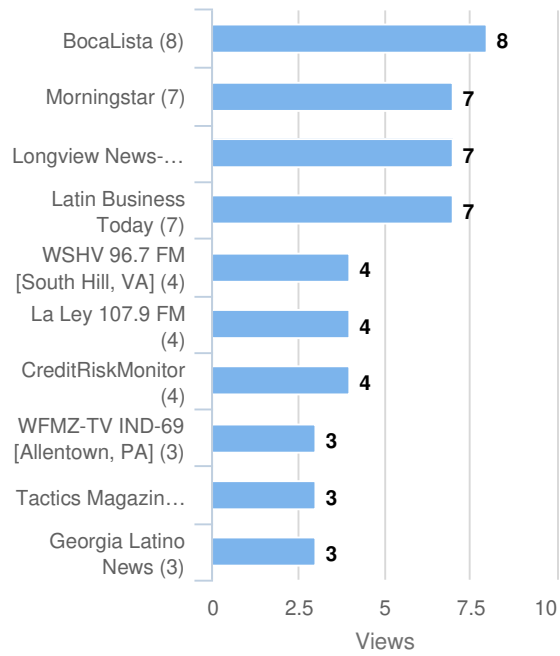
Media Views on PR Newswire for Journalists

Top 10 Outlets



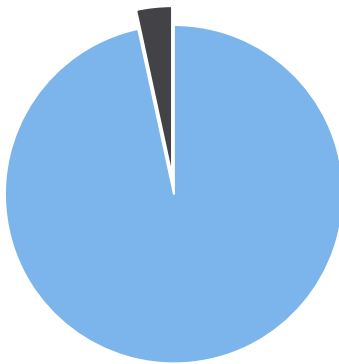
Views on Partner Sites

Top 10 Sites



Traffic to PR Newswire Properties

Type of Views



■ Desktop Views
■ Mobile/Tablet Views

Views

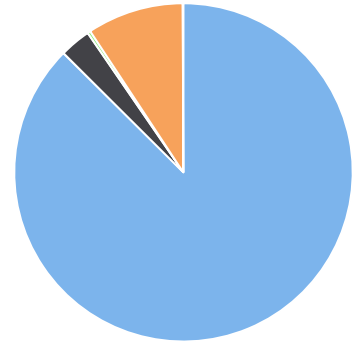
Type	Views
Desktop Views	5,598
Mobile/Tablet Views	197
Total Views on PR Newswire Properties	5,795

External Traffic Sources

Understand how viewers found your release.

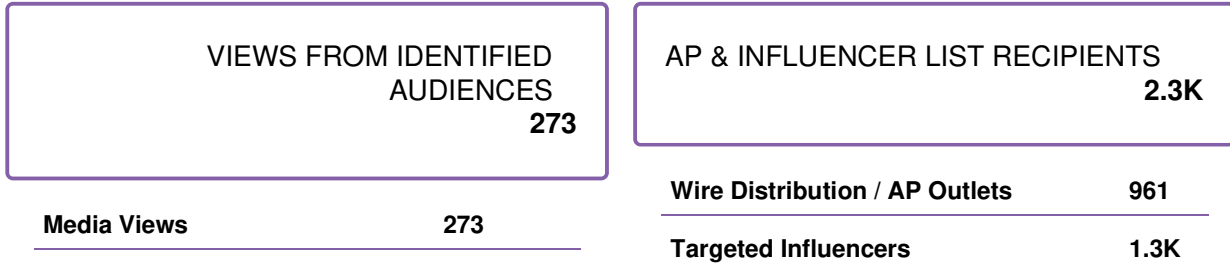
Source Type	Source	Instances
Direct		4,952
Direct	Direct	4,952
∨ Search Engine (4)		168
Total		5,662

Source Type	Source	Instances
Search Engine	Google	159
Search Engine	Bing	7
Search Engine	Yahoo!	1
Search Engine	DuckDuckGo	1
∨ Social Media (1)		16
Social Media	X	16
∨ PR Newswire Properties (2)		522
PR Newswire Properties	prnewswire.com	512
PR Newswire Properties	prweb.com	10
∨ Other Sites (4)		4
Other Sites	links.streem.com.au	1
Other Sites	cura.preqin.com	1
Other Sites	shopflex.io	1
Other Sites	entwicklungsfreu.de	1
Total		5,662



Audience

Overview

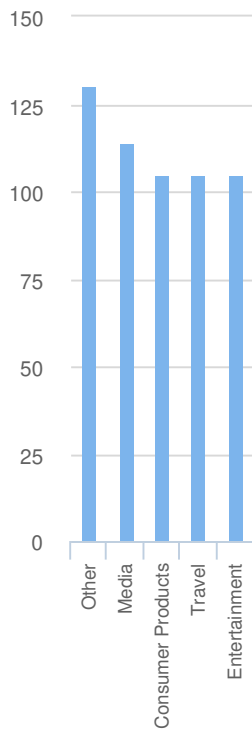


Audience Summary

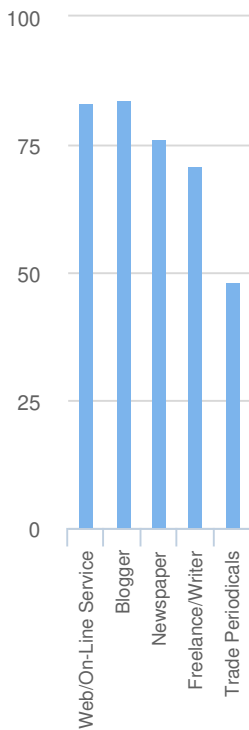
Media Demographics

A break down of the industries covered, the media types and the locations of the journalists & bloggers accessing your releases on PR Newswire for Journalists.

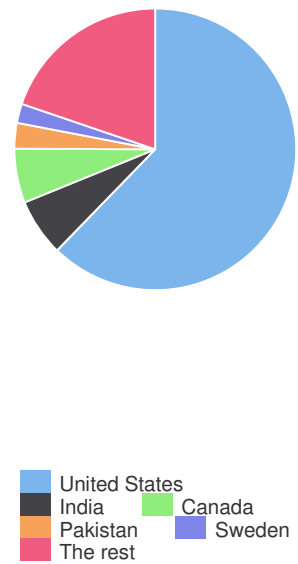
Top Industries



Top Media Types



Top Locations

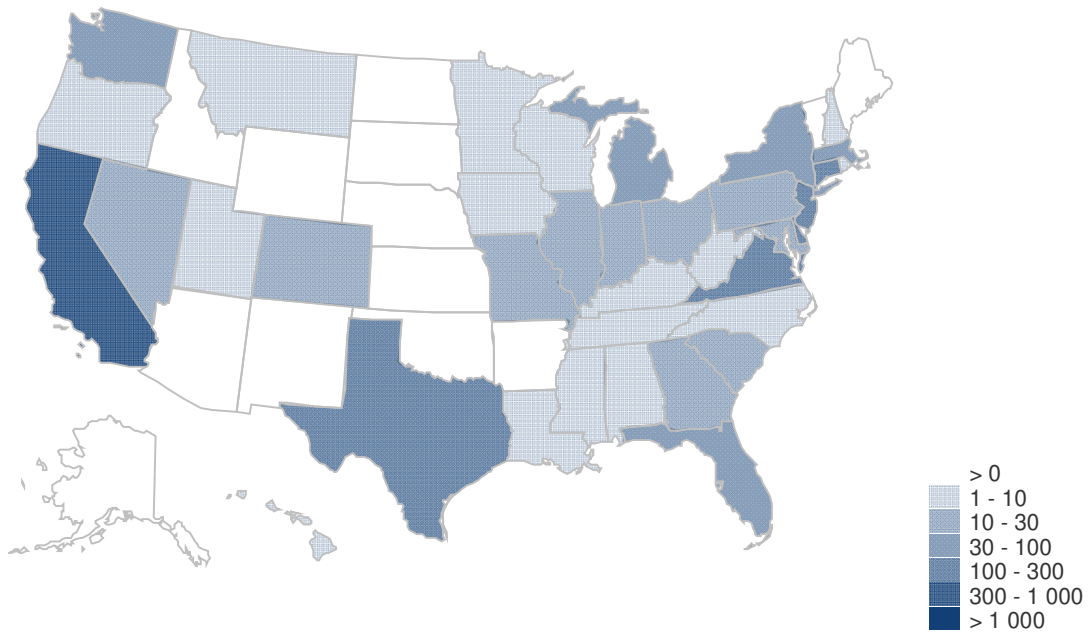
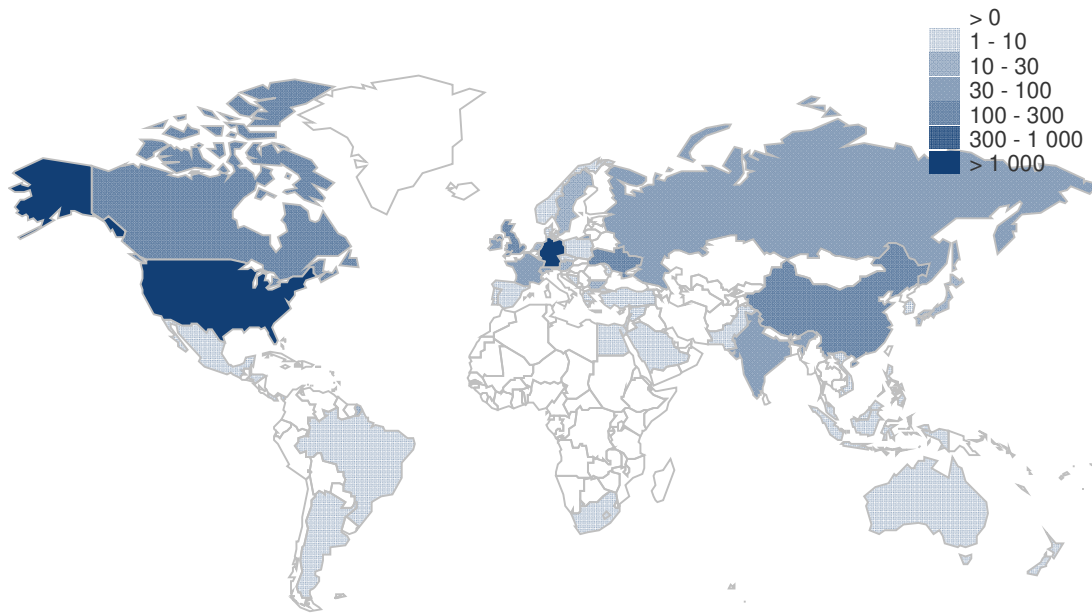


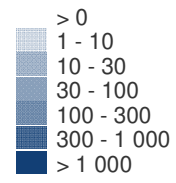
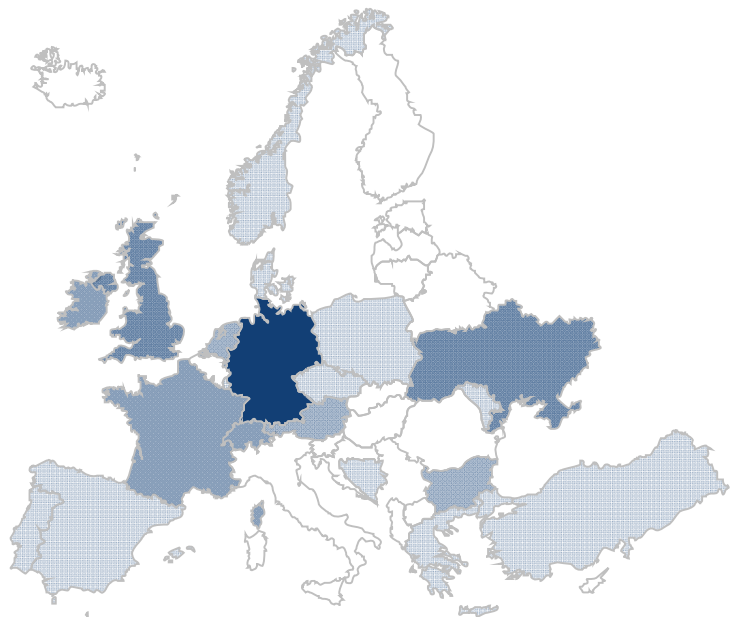
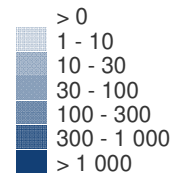
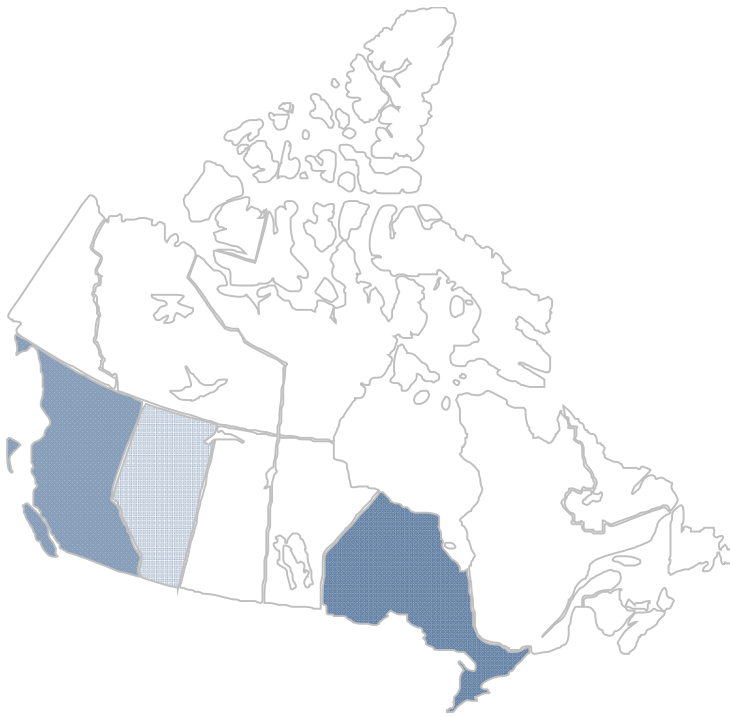
Geo-segmentation

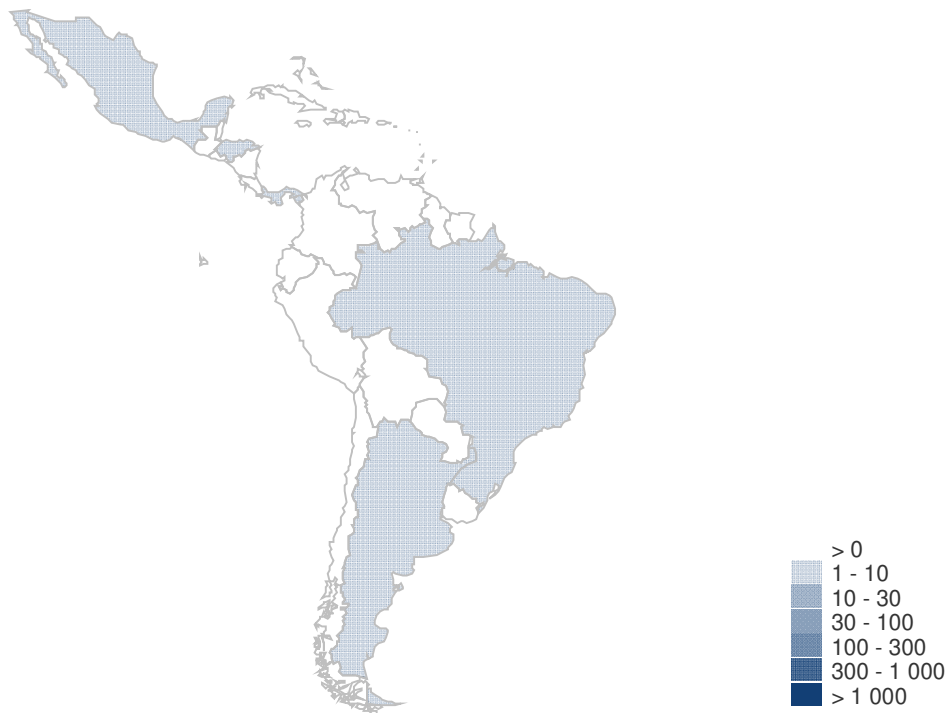
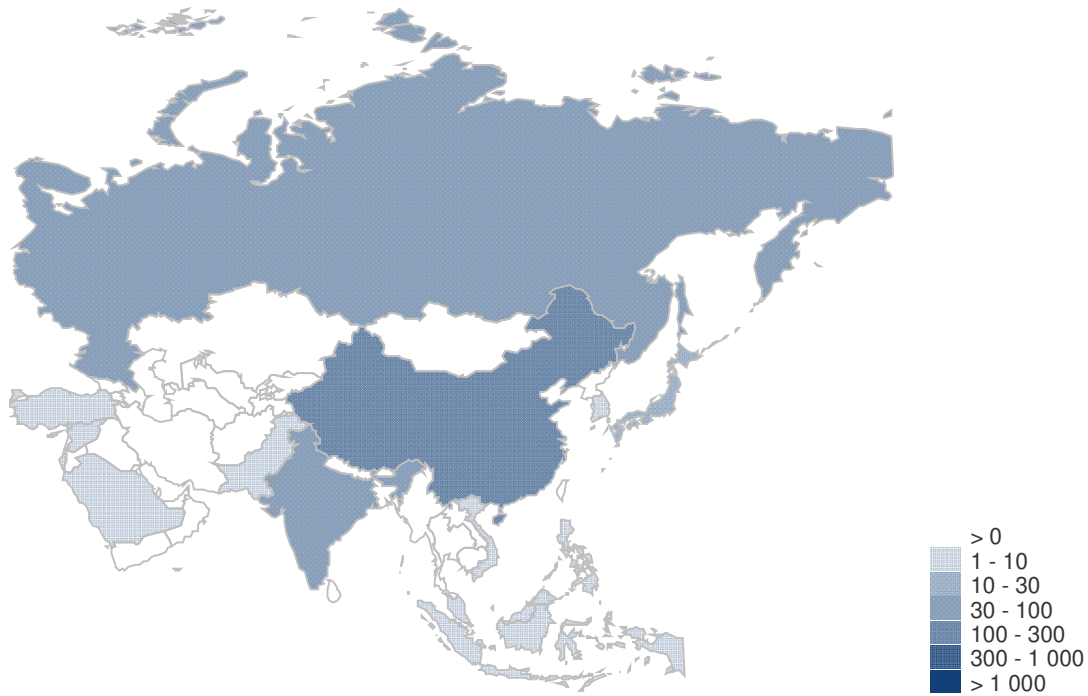
See where views of your release originated. Hover over map to see totals by location.

Select a region:

World View







Audience Details

Media Views

See the details of each media outlet from PR Newswire for Journalists that viewed your release.

Outlet	Industry	Source Type	Location	Views ▼
Freelance	Features	Freelance/Writer	Canada	3
ForkLog	Media, Technology	Freelance/Writer, Newspaper	Russia	3
Total				273

Freelancer	Entertainment, Features, Healthcare	Freelance/Writer, Newspaper	United States	3
Gaceta UNAM	Environment, Features, Healthcare, Media, Public Issues, Sports, Travel	Newspaper, Web/On-Line Service	Mexico	3
heart & soul	Entertainment, Healthcare, Travel	Consumer Periodicals, Radio, Web/On-Line Service	United States	3
Randall-Reilly Publishing Co.	Transportation	Trade Periodicals	United States	3
ROQSTAR CREW MEDIA	Broadcast, Media	Radio	United States	3
Soap Opera Network / ErrolLewis.com	Broadcast, Entertainment, Features, Media, Technology, Travel	Blogger, Freelance/Writer, Other, Television	United States	3
STEWAWEL News & Information	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Radio, Television, Web/On-Line Service, Wire Service	United States	3
Tampa Bay Business Journal	Energy, Financial Services, General Business, Healthcare, Media, Sports, Technology, Travel	Newspaper	United States	3
Economic Review	Auto, Energy, Features, Financial Services, Media, Public Issues, Sports	Freelance/Writer, Newspaper, Trade Periodicals	Pakistan	3
Spiltmilk.mom	Auto, Broadcast, Entertainment, General Business, Healthcare, Media, Other, Public Issues, Technology, Travel	Blogger, Freelance/Writer, Radio	United States	3
Nawae Pakistan	Public Issues	Web/On-Line Service	Pakistan	3
HomePage News	Consumer Products, Features	Trade Periodicals	United States	3
Houston Chronicle	Features	Newspaper	United States	3
Next Dimension Story	Other	Other	United Kingdom	3
Life a la Latina	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Blogger	United States	3
News Aktuell	Other	Wire Service	Switzerland	3
New York 1 News	Other	Television	United States	3
MT Newswires	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Wire Service	Philippines	3
Legal Support World	Other	Blogger, Freelance/Writer	United States	3
Total				273

Accion Labs	Broadcast, Entertainment, Environment	Radio	Greece	3
Pongan el Café	Broadcast, Consumer Products, Entertainment, Media, Technology, Travel	Blogger	United States	3
PR	Technology	Other	Malaysia	3
Industry Dive	Auto, Consumer Products, Energy, Entertainment, Environment, Financial Services, General Business, Healthcare, Public Issues, Technology, Transportation, Travel	Blogger, Newspaper, Trade Periodicals, Web/On-Line Service	United States	3
Path to Purchase IQ and Retail Leader	Consumer Products, Other	Trade Periodicals	United States	3
Okinawa Marine	Broadcast, Environment, Features, Financial Services, Media, Public Issues, Technology, Transportation, Travel	Freelance/Writer, Newspaper, Web/On-Line Service, Wire Service	Japan	3
Target Aid	Other	Other	Sweden	3
Fast Food Arms Race	Entertainment	Blogger	United States	3
Cision	Academe, Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Multicultural, Other, Public Issues, Sports, Technology, Transportation, Travel	Blogger, Newspaper, Television	India	3
cision	Auto	Blogger	United States	3
Cision (PR Newswire)	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Blogger, Consumer Periodicals, Freelance/Writer, Newspaper, Other, Radio, Television, Trade Periodicals, Web/On-Line Service, Wire Service	United States	3
dfv mediengruppe	Media	Other	Germany	3
CHANTELLEW	Financial Services, General Business, Public Issues	Blogger	Monaco	3
Zoomba Group	Other	Trade Periodicals	United States	3
AtmosEsp	Entertainment, Media	Other	United States	3
CBC	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Radio	Canada	3
City & State Florida	Other	Other	United States	3
Times of News 24x7	Healthcare	Blogger, Other, Web/On-Line Service	India	3
The art of mise en place	Consumer Products, Other	Blogger	Sweden	3
Total				273

The huntington news	Public Issues	Newspaper	United States	3
Delion	Environment, Financial Services, General Business, Other, Technology	Blogger, Newspaper	Canada	3
Daily News	Other	Other	South Africa	3
Winsight	Auto, Consumer Products, Technology	Trade Periodicals	United States	2
WFLA Radio	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Radio	United States	2
Viable.Earth	Auto, Consumer Products, Energy, Environment	Web/On-Line Service	Vietnam	2
North Palm Beach Life	Entertainment, Media, Travel	Blogger, Freelance/Writer, Web/On-Line Service	United States	2
Wines & Travel	Transportation, Travel	Trade Periodicals	United States	2
NewsRise	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Freelance/Writer, Newspaper, Radio, Wire Service	Malaysia	2
New Tech Bites	Technology	Blogger	Egypt	2
NBCUniversal	Consumer Products, Media	Television, Web/On-Line Service	United States	2
TendanceHotellerie.fr	Technology, Travel	Web/On-Line Service	France	2
Young Aspects Magazine	Entertainment, Environment, Features, Media, Other, Public Issues, Travel	Other	United States	2
WSAZ	Financial Services	Television	United States	2
NewsRx	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Web/On-Line Service	United States	2
Philadelphia Inquirer	General Business	Newspaper	United States	2
Sing Tao Daily Toronto Edition 多伦多星岛	Other	Newspaper	Canada	2
Slice Publications Ltd	Other	Other	New Zealand	2
Total				273

Retail Gazette	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Blogger, Consumer Periodicals, Freelance/Writer, Newspaper, Other, Radio, Television, Trade Periodicals, Web/On-Line Service, Wire Service	United Kingdom	2
The Talk of Titusville	Media	Blogger, Other, Web/On-Line Service	United States	2
The Messenger	Financial Services, General Business, Technology	Web/On-Line Service	United States	2
The Hangry Woman	Consumer Products, Travel	Blogger, Freelance/Writer	United States	2
PremierPhotoInt'l	Consumer Products, Entertainment, Features, Media, Sports, Travel	Blogger, Freelance/Writer	United States	2
Retail Leader	Media	Trade Periodicals	United States	2
Various publications	Consumer Products, Entertainment, Other, Travel	Blogger, Freelance/Writer	United States	2
Unites States Press Agency	Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Web/On-Line Service	France	2
Static Media	Consumer Products, Other	Freelance/Writer, Web/On-Line Service	United States	2
TWVNews India	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Newspaper	India	2
Orlando Business Journal	Other	Newspaper, Trade Periodicals, Web/On-Line Service	United States	2
KnowTheBuzz	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Newspaper	India	2
Daily evening Newspaper	Public Issues	Newspaper	Pakistan	2
CookingChew.com / Ralph's Media	Consumer Products, Features, General Business, Media, Other	Blogger	United States	2
CNN	Consumer Products, Environment, General Business	Web/On-Line Service	United States	2
CNBC-TV18	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Web/On-Line Service	India	2
Deutscher Fachverlag	Consumer Products, Other	Newspaper, Web/On-Line Service	Germany	2
Total				273

Diemel Communications	Features, General Business, Healthcare, Public Issues, Technology, Travel	Freelance/Writer	United States	2
EL PAIS	Consumer Products, Energy, Entertainment, Financial Services, General Business, Media, Technology, Transportation, Travel	Newspaper	United States	2
Edge Media, Harvard Bulletin	Entertainment, Features, Healthcare	Freelance/Writer	United States	2
Dotdash Meredith	Consumer Products, Entertainment, Features, Healthcare, Media, Other, Technology, Travel	Blogger, Freelance/Writer, Other, Web/On-Line Service	United States	2
Doc Lawrence Productions	Broadcast, Consumer Products, Entertainment, Features, General Business, Media, Sports, Travel	Blogger, Freelance/Writer, Newspaper	United States	2
CleverCrumb	Entertainment, Financial Services, Healthcare, Other, Public Issues, Sports, Technology, Travel	Blogger, Other	India	2
Chemical Processing	Energy, Environment, General Business, Heavy Industry, Technology	Trade Periodicals	United States	2
Arch City Media	Entertainment, Media, Other, Sports	Blogger, Web/On-Line Service	United States	2
Ampersand & amp; Ampersand, LLC	Broadcast, Consumer Products, Entertainment, Features, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Other	United States	2
ALM	Other	Newspaper	United States	2
Al Khair Charity Group	Broadcast, Consumer Products, Entertainment, Environment, Features, Financial Services, Healthcare, Media, Other, Public Issues	Blogger, Freelance/Writer, Other, Web/On-Line Service	Syria	2
Adams Editorial Services	Consumer Products, Environment, Healthcare, Heavy Industry, Other, Technology	Freelance/Writer, Trade Periodicals	United States	2
Askwame.com	Auto, Entertainment, Features, Media, Other, Sports, Transportation, Travel	Blogger, Web/On-Line Service	United States	2
Cert Center Canada	Auto, Broadcast, Consumer Products, Energy, Entertainment, Environment, Features, Financial Services, General Business, Healthcare, Heavy Industry, Media, Other, Public Issues, Sports, Technology, Transportation, Travel	Blogger, Consumer Periodicals, Freelance/Writer, Newspaper, Other, Radio, Television, Trade Periodicals, Web/On-Line Service, Wire Service	Canada	2
CanGlobal Media	Auto, Broadcast, Entertainment, Features, General Business, Heavy Industry, Media, Public Issues, Technology, Transportation, Travel	Blogger, Consumer Periodicals, Freelance/Writer, Newspaper, Radio, Television, Web/On-Line Service	Canada	2
Bloomberg News	Other	Wire Service	Netherlands	2
Nation's Restaurant News	Features, General Business, Other	Trade Periodicals, Web/On-Line Service	United States	2
Fast Food Review	Consumer Products, Entertainment	Blogger, Freelance/Writer, Newspaper	United States	2
Luxxxe Magazine	Entertainment, Other, Travel	Consumer Periodicals	United States	2
Total				273

KrazzyMag	Auto, Entertainment, Financial Services, Healthcare, Media, Sports, Technology, Travel	Blogger, Other, Web/On-Line Service	India	2
Kingsport Times-New	Other	Newspaper	United States	2
Inside Retail US	Auto, Consumer Products, Features, General Business, Healthcare, Other, Technology, Travel	Web/On-Line Service	United States	2
Mann Publications	Consumer Products, Entertainment, Features, General Business, Media, Other, Public Issues, Technology, Travel	Blogger, Freelance/Writer, Newspaper, Other, Trade Periodicals, Web/On-Line Service	United States	2
MediaPost	Consumer Products, Entertainment, General Business, Media, Other, Travel	Freelance/Writer	United States	2
Naptown Buzz LLC	Auto, Consumer Products, Entertainment, Environment, Features, General Business, Healthcare, Media, Other, Public Issues, Sports, Technology, Travel	Blogger, Consumer Periodicals, Web/On-Line Service	United States	2
mmirandalaurenn	Consumer Products, Entertainment, Media, Other	Blogger	United States	2
Minneapolis Star Tribune	General Business, Public Issues	Newspaper	United States	2
Industry Dive	Consumer Products, Energy, Environment, Features, Financial Services, General Business, Public Issues, Technology	Web/On-Line Service	United States	2
Industry Dive	Consumer Products	Web/On-Line Service	United States	2
Food Service Equipment Reports	Consumer Products	Freelance/Writer, Trade Periodicals	United States	2
Food Dive	Consumer Products	Trade Periodicals	United States	2
Flyoverfuture.com	Technology	Freelance/Writer, Web/On-Line Service	United States	2
Feather River Bulletin	Other	Newspaper	United States	2
Freelancer	Other	Trade Periodicals	United States	2
Gulf Coast Business Review	General Business	Newspaper	United States	2
Indépendante	Environment, Media, Public Issues	Freelance/Writer	Canada	2
Humari Baat	Consumer Products, Environment, Features, Financial Services, General Business, Other, Public Issues, Sports, Technology, Travel	Web/On-Line Service	India	2
hispanic pr blog	Media	Freelance/Writer	United States	2
Advantage Business Media	Other	Consumer Periodicals	United States	2
Total				273

Speak Up	Travel	Trade Periodicals	Spain	1
Voice of America	Media	Web/On-Line Service	United States	1
Total				273

Targeted Audience

The lists below represent categories of targeted audiences you selected for your release.

Cision Influencer Lists

Business & Finance (English) (162 organizations, 212 recipients)

Organization	Number of recipients
Freelancer	14
El Observador	5
The Associated Press	4
Dos Mundos	3
Hispanic Network Magazine	3
LATINA Style	3
NBC News Latino	3
PlanetM	3
Al día en América	2
¡Que Onda! Magazine	2

Business & Finance (Spanish) (680 organizations, 1,261 recipients)

Organization	Number of recipients
Freelancer	70
Univisión Network	41
Univisión 34 Los Ángeles	21
CNN en Español	15
Telemundo 52	14
Univisión 21 Fresno	11
WJAN LD Ch. 41 América TeVe	11
Agencia EFE	10
KRCA Ch. 62 Estrella TV	10
Univisión Arizona	10

Associated Press Outlets

PR Newswire's wire newlines include targeted distribution to the Associated Press, an essential global news network that delivers content to an extensive set of media platforms and formats. The list below represents the outlets you reach via this partnership.

Outlet Name	City	State	Location	Type	Audience
C-SPAN	Washington	DC	US	Television	86,200,000 Subscribers
Scribd, Inc.	San Francisco	CA	US	Aggregator	43,531,670 Visitors per Month
FoxNews.com	New York	NY	US	Online	32,516,438 Visitors per Month
CBS News Radio	New York	NY	US	Radio	30,000,000 Broadcast Audience
New York Times Digital	New York	NY	US	Newspaper	29,886,442 Visitors per Month
Apple Inc.	Cupertino	CA	US	Organization/Company	29,709,459 Visitors per Month
CNBC.com	Englewood Cliffs	NJ	US	Online	26,089,260 Visitors per Month
CBSnews.com	New York	NY	US	Online	26,080,671 Visitors per Month
abcnews.com	New York	NY	US	Online	24,167,779 Visitors per Month
U.S. News & World Report	Washington	DC	US	Magazine	23,945,529 Visitors per Month

Engagement

Overview

TOTAL ENGAGEMENT ACTIONS

195

Click-throughs

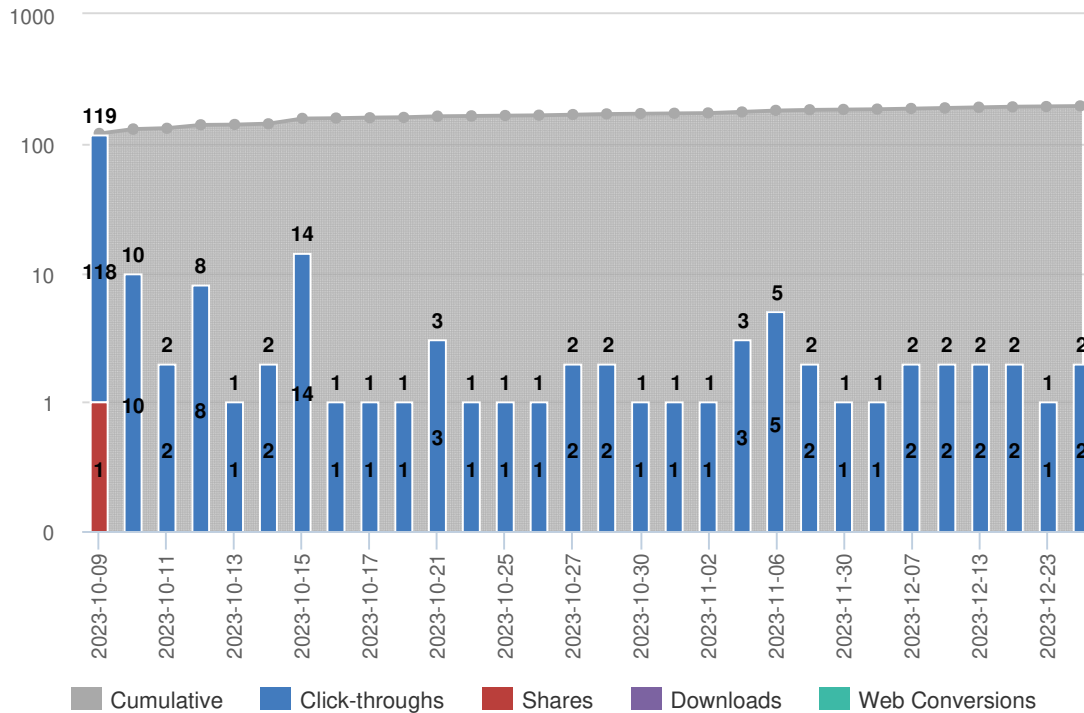
194

Shares

1

Engagement Timeline

See when your audience engaged with your release.



Engagement Details

A break down of click-throughs, shares and other engagement actions.

Click-throughs

The number of times your releases sent visitors to the pages you linked to.

URL	Click-throughs
Total	194

URL	Click-throughs
https://www.earlsettlement.com/?utm_source=PRN&utm_medium=Intro1&utm_campaign=Earl	35
https://www.earlsettlement.com/?utm_source=PRN&utm_medium=Intro2&utm_campaign=Earl	29
https://www.earlsettlement.com/?utm_source=PRN	22
https://www.earlsettlement.com/?utm_source=PRN&utm_medium=Benefits&utm_campaign=Earl	22
https://www.earlsettlement.com/?utm_source=PRN_Spa&utm_medium=Intro1&utm_campaign=Earl	20
https://www.earlsettlement.com/?utm_source=PRN&utm_medium=MoreInfo&utm_campaign=Earl	19
https://www.earlsettlement.com/?utm_source=PRN&utm_medium=Options&utm_campaign=Earl	19
https://www.earlsettlement.com/?utm_source=PRN_Spa&utm_medium=MoreInfo&utm_campaign=Earl	8
https://www.earlsettlement.com/?utm_source=PRN_Spa&utm_medium=Intro2&utm_campaign=Earl	7
https://www.earlsettlement.com/?utm_source=PRN_Spa&utm_medium=Benefits&utm_campaign=Earl	6
https://www.earlsettlement.com/?utm_source=PRN_Spa&utm_medium=Options&utm_campaign=Earl	6
https://www.earlsettlement.com/?utm_source=PRN_Spa	1
Total	194

Shares

A break down of the types of sharing your releases generated.

Type of share	Shares
Webmail	1
Total Shares	1