

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

DAVID MOSKOWITZ, et al.,  
Plaintiff,  
  
-against-  
  
AMERICAN EXPRESS COMPANY and  
AMERICAN EXPRESS TRAVEL RELATED  
SERVICES COMPANY, INC.,  
Defendants.

Case No.: 1:19-cv-00566 (NGG) (JRC)

**SUPPLEMENTAL DECLARATION  
OF MARK COWEN REGARDING  
SETTLEMENT ADMINISTRATION**

I, Mark Cowen, hereby declare as follows:

1. I am a Project Manager at A.B. Data, Ltd.’s Class Action Administration Division (“A.B. Data”), whose corporate office is located in Milwaukee, Wisconsin. This declaration (“Declaration”) is based upon my personal knowledge, and that of A.B. Data staff members, and if called as a witness, I could and would testify competently thereto.

2. I submit this Declaration to supplement my earlier declaration, the April 9, 2026, Declaration of Mark Cowen Regarding Settlement Administration. This Declaration will provide updates regarding the administration of the Settlement, including the status of Claims submitted, the review of those Claims, and any deficiency process to be followed to make a final determination on all Claims.

**CLAIMS**

3. Class Members who wish to be eligible to receive a distribution from the Settlement are required to complete and submit to A.B. Data a properly executed Claim Form postmarked or submitted online no later than May 19, 2026.

4. In preparation for receiving and processing the submitted Claim Forms, A.B. Data created a unique database to store Claim Form images, claim details, and trained staff in the specifics of the project so that Claim Forms would be properly processed.

5. As of the date of this Declaration, A.B. Data received approximately 2,195,357 Claim Forms through the online filing portal on the case-specific website, by email, or by mail. Upon receipt, each Claim Form was assigned a unique identification number in the claims database, and A.B. Data personnel captured and stored the details from each Claim Form, including the claimant's name, address, email address, and any other information provided.

6. Prior to performing deficiency and denial reviews, A.B. Data will conduct a review to identify and combine duplicate Claim submissions to establish unique Claims.

7. In addition, A.B. Data has engaged with a third-party, Covalynt, (formerly known as ClaimScore, LLC), a legal technology company specializing in complex data analysis and pattern recognition services. Covalynt has been asked to help with verification of residency of a Claimant in the state of Illinois during the Class Period.

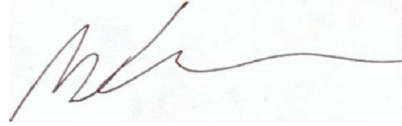
8. Claims that do not state that they were a resident of Illinois, or were not found to have been a resident of Illinois by Covalynt, during the Class Period will be sent a Notice of Rejection, indicating that in the terms of the Settlement they must have had a credit-card billing address in Illinois during the Class Period to be eligible to file a Claim.

9. A final determination of valid Claims will be made after all deficient Claim deadlines have been met, all claims have been determined eligible by the Claim matching exercise indicated above, and all de-duplication efforts have been made.

### **OBJECTIONS**

10. The deadline for Class Members to object to or comment on the proposed Settlement, Plan of Distribution, and/or the request for attorneys' fees, costs, and expenses and service awards was April 29, 2026. As of the date of this Declaration, A.B. Data has been made aware of two Objections to the Settlement, both of which were filed on the docket in this action.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 18th day of May 2026 in Apple Valley, MN.

A handwritten signature in black ink, appearing to read 'Mark Cowen', is written over a light blue rectangular background.

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Mark Cowen