

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ATG FUND II LLC, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

VPC IMPACT ACQUISITION HOLDINGS
SPONSOR II, LLC, BRENDAN CARROLL,
GORDON WATSON, CARLY ALTIERI,
JOHN MARTIN, JOSEPH LIEBERMAN,
and KAI SCHMITZ,

Defendants,

-and-

VPC IMPACT ACQUISITION HOLDINGS
II,

Nominal Defendant.

Civil Action No. 22-1978-JSR

**DECLARATION OF EMILY YOUNG REGARDING (A) DISTRIBUTION
OF THE NOTICE, (B) MAINTENANCE OF THE SETTLEMENT
WEBSITE AND (C) PUBLICATION OF THE SUMMARY NOTICE**

I, Emily Young, declare as follows:

1. I am a Director at Epiq Corporate Restructuring (“Epiq” or the “Settlement Administrator”), the Court-approved settlement administrator of the proposed Settlement in the above-captioned action (the “Action”).

2. Pursuant to the Court’s June 18, 2024 *Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement* (ECF 28) (the “Preliminary Approval Order”), Epiq was authorized to act as the settlement administrator to complete, among other things, the tasks set forth below.

3. I am over 21 years of age and am not a party to the Action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

TRANSMITTAL OF THE NOTICE

4. On July 15, 2024, Epiq began to disseminate electronically and by U.S. Mail the *Notice of (I) Pendency of Derivative and Class Action and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for Attorneys' Fees and Litigation Expenses* (the "Notice"), attached hereto as Exhibit 1, to Class members in accordance with the Preliminary Approval Order.

5. The Notice advised Class members of the terms of the Settlement, the attorneys' fees and expenses expected to be requested, the incentive award expected to be requested, the deadline of September 5, 2024 to submit objections, and the fairness hearing set by the Court for September 26, 2024 at 4:00 p.m.

6. As of August 16, 2024, Epiq has sent 239 copies of the Notice to all known members of the Class.

7. Epiq has encountered no challenges in disseminating the Notice to the members of the Class.

SETTLEMENT WEBSITE

8. On July 12, 2024, Epiq created the settlement website—www.vihiisettlement.com—to make the Notice available online and to provide Class members with easy access to other key materials.

9. In addition to the Notice, the website includes the (i) *Amended Class Action and Derivative Complaint* (ECF 12); and (ii) the Preliminary Approval Order.

10. The website will continue to be available to the Class until the final approval of the Settlement.

PUBLICATION OF SUMMARY NOTICE

11. On July 22, 2024, Epiq caused the *Summary Notice of (I) Pendency of Derivative and Class Action and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for Attorneys' Fees and Litigation Expenses* (the "Summary Notice") to be published in *Investors Business Daily*. A copy of the publication is attached hereto as Exhibit 2.

12. On July 22, 2024, Epiq disseminated a press release regarding the Summary Notice through Global Newswire. A copy of the press release is attached hereto as Exhibit 3.

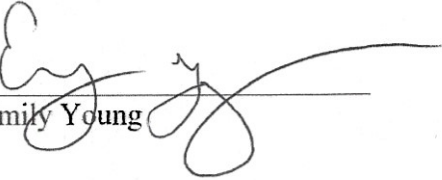
CLASS RESPONSE

13. As of August 20, 2024, Epiq is unaware of any Class member with objections to the Settlement.

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

Date: August 21, 2024


Emily Young