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10 Attorneys for Defendants, WELLS FARGO &  
COMPANY and WELLS FARGO BANK, N.A.

11  
12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15  
16 SHAHRIAR JABBARI and KAYLEE  
HEFFELFINGER, on behalf of themselves  
17 and all others similarly situated,

18 Plaintiff,

19 vs.

20 WELLS FARGO & COMPANY and WELLS  
FARGO BANK, N.A.,

21 Defendants.  
22

Case No. 15-CV-02159 VC

**DECLARATION OF CHRIS MATHEWS  
IN SUPPORT OF MOTION FOR FINAL  
APPROVAL OF CLASS ACTION  
SETTLEMENT**

Judge: Hon. Vince Chhabria  
Ctrm.: 4  
Date: March 22, 2018  
Time: 10:00 AM

1 I, Chris Mathews, state and declare as follows:

2 1. I am a Strategic Planning Manager at Wells Fargo Bank, N.A. (“Wells Fargo”). I  
3 have been employed by Wells Fargo for approximately 38 years.

4 2. In my current position, I am responsible for coordinating Wells Fargo’s  
5 implementation of the Amended Stipulation and Agreement of Class Action Settlement and  
6 Release (“Settlement”) in this action. The following information was provided to me in that role.

7 3. Pursuant to the Settlement, Wells Fargo caused notices to be sent by electronic  
8 mail to 39,465,679 current and former Wells Fargo customers between August 31, 2017 and  
9 October 5, 2017. The text of these emails was in two forms. The standard form (English and  
10 Spanish versions) is attached at Exhibit A hereto. Slightly different text was used when Wells  
11 Fargo had information indicating that the customer in question was deceased. That alternative  
12 language is attached at Exhibit B hereto.

13 4. Also pursuant to the Settlement, Wells Fargo incorporated notices in account  
14 statements for consumer and small business checking and savings accounts and consumer and  
15 small business unsecured credit cards and unsecured lines of credit. The content of that notice is  
16 set forth in Exhibit C hereto. For accounts that receive monthly statements, the notices were  
17 included in the statements mailed or made available electronically in September 2017. For  
18 accounts that receive quarterly statements, the notices were included in the statements for the  
19 third quarter 2017, which were sent or made available electronically in the first week of October  
20 2017. A total of 67,346,065 statements incorporated the notice.

21 5. In addition to the notices it sent or caused to be sent, Wells Fargo provided the  
22 Settlement Administrator with information concerning two groups of current or former  
23 customers, which the Settlement Administrator used for providing Mailed Notice. One group  
24 consisted of those customers who had an account identified in the Consultant Analysis. That  
25 group included 2,935,264 current or former customers and the information was provided to the  
26 Settlement Administrator on September 6, 2017. The second group consisted of customers who  
27 were identified in the Customer Complaint Review Process. Wells Fargo provided information  
28 concerning 90,586 such customers to the Settlement Administrator on September 8, 2017 and

1 updated that list with information concerning an additional 12,981 customers on October 16,  
2 2017, and 819 customers on December 20, 2017.

3

4 I declare under penalty of perjury under the laws of the United States that the foregoing is  
5 true and correct.

6 Executed January 17, 2018, at Sacramento, California.

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By:   
Chris Mathews

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# **Exhibit A**

**English Version:**

As part of our commitment to make things right, we have entered into a \$142 million class action settlement related to the opening of unauthorized accounts.

If you believe Wells Fargo opened a checking, savings, credit card, or line of credit account for you without your permission, or if you purchased identity theft protection from us, you may be entitled to compensation from this fund.

To find out more, go to [www.WFSettlement.com](http://www.WFSettlement.com) or call 1-866-431-8549. You may be eligible for reimbursement of fees, compensation for potential impact on your credit, and an additional cash payment based on any money remaining in the fund after benefits and costs are paid out.

If you have specific questions about any of your accounts or services, please visit your Wells Fargo branch or call 1-8XX-XXX-XXXX. Thank you for being a Wells Fargo customer.

**Spanish Version:**

Como parte de nuestro compromiso de hacer lo correcto, hemos celebrado un acuerdo de liquidación de demanda colectiva por \$142 millones en relación con la apertura de cuentas no autorizadas.

Si usted cree que Wells Fargo le abrió una cuenta de cheques, de ahorros, de tarjeta de crédito o de línea de crédito sin su permiso, o si nos compró el servicio de protección contra robo de identidad, es posible que tenga derecho a una indemnización de este fondo.

Para obtener más información, visite [www.WFSettlement.com](http://www.WFSettlement.com) o llame al [1-866-431-8549](tel:1-866-431-8549) (en inglés). Usted podría ser elegible para un reembolso de cargos, una compensación por el posible impacto en su crédito, y un pago en efectivo adicional basado en el dinero que quede en el fondo después de que se paguen los beneficios y costos.

Si tiene preguntas específicas sobre alguna de sus cuentas o servicios, visite una sucursal de Wells Fargo o llámenos al [1-800-869-3557](tel:1-800-869-3557). Gracias por ser cliente de Wells Fargo.

# **Exhibit B**

As part of our commitment to make things right, we have entered into a \$142 million class action settlement related to the opening of unauthorized accounts.

If there's reason to believe Wells Fargo opened a checking, savings, credit card, or line of credit account for the above account holder without their permission, or if they purchased identity theft protection from us, there may be compensation available from this fund.

More information is available at [www.WFSettlement.com](http://www.WFSettlement.com) or by calling 1-866-431-8549. Impacted accounts may be eligible for reimbursement of fees, compensation for potential impact on credit, and an additional cash payment based on any money remaining in the fund after benefits and costs are paid out.

If you have specific questions about Wells Fargo accounts or services, please visit a Wells Fargo branch or call 1-800-869-3557.

Thank you.

# **Exhibit C**



**English Version:**

As part of our commitment to make things right, we have entered into a \$142 million class action settlement related to the opening of unauthorized accounts.

If you believe Wells Fargo opened a checking, savings, credit card or line of credit account for you without your permission, or if you purchased identity theft protection from us, you may be entitled to compensation from this fund.

To find out more, go to [www.WFSettlement.com](http://www.WFSettlement.com) or call 1-866-431-8549. You may be eligible for reimbursement of fees, compensation for potential impact on your credit, and an additional cash payment based on any money remaining in the fund after benefits and costs are paid out.

If you have specific questions about any of your accounts or services, please visit your Wells Fargo branch or call the toll-free number that appears on this statement. We realize you have a choice when it comes to banking. It is our privilege to be able to serve you.

**Spanish Version:**

Como parte de nuestro compromiso de hacer lo correcto, hemos celebrado un acuerdo de liquidación de demanda colectiva por \$142 millones en relación con la apertura de cuentas no autorizadas.

Si usted cree que Wells Fargo le abrió una cuenta de cheques, cuenta de ahorros, cuenta de tarjeta de crédito o cuenta de línea de crédito sin su permiso, o si compró nuestra protección contra robo de identidad, usted podría tener derecho a una indemnización de este fondo.

Para obtener más información, visite [www.WFSettlement.com](http://www.WFSettlement.com) o llame al 1-866-431-8549. Usted podría ser elegible para el reembolso de cargos, compensación por el posible impacto en su crédito, y un pago en efectivo adicional en función de cualquier dinero restante en el fondo después que se paguen los beneficios y costos.

Si tiene preguntas específicas sobre cualquiera de sus cuentas, visite su sucursal de Wells Fargo o llame al número gratuito que aparece en esta declaración. Gracias por ser un cliente.