

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

ARKANSAS FEDERAL CREDIT UNION
and THE SUMMIT FEDERAL CREDIT
UNION, on Behalf of Themselves and All
Others Similarly Situated,

Plaintiffs,

v.

HUDSON'S BAY COMPANY, SAKS FIFTH
AVENUE LLC, SAKS & COMPANY LLC,
SAKS INCORPORATED, and LORD &
TAYLOR, LLC,

Defendants.

Case No. 19-cv-4492 (PKC)

SUPPLEMENTAL DECLARATION OF JOSEPH P. GUGLIELMO

I, Joseph P. Guglielmo, pursuant to 28 U.S.C. §1746, declare as follows:

1. I am a partner in the law firm of Scott+Scott Attorneys at Law LLP (“Scott+Scott”), one of the attorneys representing Plaintiffs Arkansas Federal Credit Union and The Summit Federal Credit Union (“Plaintiffs”), and Class Counsel in the above-captioned action (the “Litigation”) against Defendants Hudson’s Bay Company ULC (formerly known as Hudson’s Bay Company) (“HBC”), Saks Fifth Avenue LLC, Saks & Company LLC, and Saks Incorporated (collectively, “Saks”), and Lord & Taylor, LLC (“Lord & Taylor”) (collectively, “Hudson Bay” or “Defendants”, and with Plaintiffs, the “Parties”). I provide this Declaration in support of Plaintiffs’ Unopposed Motion for Final Approval and Plaintiffs’ Unopposed Motion for Attorney’s Fees, Reimbursement of Litigation Expenses, and Class Representative Service Awards, and to supplement the information provided in my previously filed Declaration appearing at ECF No. 86. I have personal knowledge of all matters set forth herein and would testify competently to them if called upon to do so.

2. As of the date of this Declaration, I have not received any objections to the Settlement from any Settlement Class Members. Pursuant to the Preliminary Approval Order, any objection from a Settlement Class Member must be “mailed to the Clerk of Court, Class Counsel, and Hudson’s Bay’s Counsel, at the addresses listed in the Notice, and postmarked by no later than the Objection Deadline, which is November 15, 2021.” (ECF No. 91, ¶16).

3. I believe Service Awards of \$3,000 to each Settlement Class Representative provide reasonable compensation for their time, effort, and risks assumed in prosecution of this litigation. Each Settlement Class Representative actively participated in all phases of the litigation by providing information and documents to Class Counsel. The Controller and Vice President of Accounting at Arkansas Federal Credit Union, the Vice President of Finance and Risk Management, and the Director of Compliance and Risk Management at The Summit Federal Credit Union were all active participants in the mediation session before the Hon. Diane M. Welsh (Ret.). Their active participation was instrumental to Class Counsel’s ability to prosecute the litigation and determine that the Settlement was fair, reasonable, and adequate.

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

Executed on November 1, 2021

/s/ Joseph P. Guglielmo
Joseph P. Guglielmo