

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

***In re LastPass Data Security Incident
Litigation***

Case No.: 1:22-CV-12047-PBS

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

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Plaintiffs¹ respectfully move this Court for entry of an Order: (1) providing final approval of the proposed Class Action Settlement Agreement and Release (“Settlement”) with Defendant LastPass US LP (“LastPass” or “Defendant”) and non-defendants GoTo Technologies USA, LLC, Francisco Partners Management, L.P., Francisco Partners Consulting, LLC, and Elliott Investment Management L.P., and finding that the Settlement is fair, reasonable, and adequate; (2) providing final certification, for purposes of the Settlement only, of the following Settlement Class:

All natural persons residing in the United States, as well as all companies, entities, and organizations registered to do business in the United States, whose LastPass accounts were allegedly compromised, extracted, copied, stolen, or otherwise exposed as a result of the 2022 LastPass Data Security Incident, and whose accounts contained data at the time of the Incident.

The Settlement Class specifically excludes: (1) Defendant, GoTo Technologies USA, LLC, Francisco Partners Management, L.P., Francisco Partners Consulting, LLC, Elliott Investment Management, L.P., and their officers and directors; (2) all Persons who submit an Opt-Out from the Settlement; (3) the Court; and (4) any person found by a court of competent jurisdiction to be guilty under criminal law of initiating, causing, aiding or abetting the criminal activity occurrence of the Incident, or who pleads nolo contendere to any such charge.

¹ Plaintiffs are Amy Doermann, Ayana Looney, Dan LeFebvre, David Andrew, Erik Brook, Glenn Mulvenna, Hui Li, Nathan Goldstein, Noah Bunag, R. Andre Klein, Sarb Dhesi, Steven Carter, Debt Cleanse Group Legal Services LLC, and Hustle N Flow Ventures LLC (“Plaintiffs”).

(3) confirming that the notice plan approved by the Court in its February 2, 2026, Preliminary Approval Order (Dkt. 311) has been fully and sufficiently effectuated; (4) finally appointing Plaintiffs as the Settlement Class Representatives; (5) finally appointing Class Counsel to act on behalf of the Settlement Class and the Settlement Class Representatives with respect to the Settlement; (6) entering the proposed final judgment; and (7) granting such other and further relief as may be just and appropriate.

This Motion is based upon the record in this case as well as the concurrently filed: (1) Memorandum of Law in Support of Plaintiffs' Motion for Final Approval; (2) the Executed Settlement Agreement (Dkt. No. 305-1); (3) Declaration of Class Counsel in Support of Plaintiffs' Motion for Final Approval; and (4) Declaration of Cameron R. Azari regarding Settlement Administration, as well as any additional materials and argument that may be presented to the Court.

Dated: May 18, 2026

Respectfully submitted by:

** Admitted Pro Hac Vice*

/s/ Ian McLoughlin
Edward F. Haber (BBO# 215620)
Ian McLoughlin (BBO #647203)
Patrick J. Valley (BBO# 663866)
SHAPIRO HABER & URMY LLP
One Boston Place, Suite 2600
Boston, MA 02108
Tel: (617) 439-3939
Fax: (617) 439-0134
ehaber@shulaw.com
imcloughlin@shulaw.com
pvalley@shulaw.com

Interim Liaison Counsel

Amy Keller*
James A. Ulwick*
DICELLO LEVITT LLP
Ten North Dearborn Street, Sixth Floor
Chicago, IL 60602
Tel: (312) 214-7900
Fax: (312) 253-1443
akeller@dicellolevitt.com
julwick@dicellolevitt.com

Nathaniel L. Orenstein (BBO #664513)
Patrick T. Egan (BBO #637477)
Justin N. Saif (BBO #660679)
BERMAN TABACCO
One Liberty Square
Boston, MA 02109
Tel: (617) 542-8300
Fax: (617) 542-1194
norenstein@bermantabacco.com
pegan@bermantabacco.com
jsaif@bermantabacco.com

Nicholas A. Migliaccio*
Jason Rathod*
Bryan Faubus*
MIGLIACCIO & RATHOD LLP
412 H Street NE, Ste. 302
Washington, DC 20002
Tel: (202) 470-3520
Fax: (202) 800-2730
nmigliaccio@classlawdc.com
jrathod@classlawdc.com
bfaubus@classlawdc.com

Interim Co-Lead Counsel for the Plaintiffs

Michael R. Reese*
REESE LLP
100 West 93rd Street, 16th Floor
New York, New York 10025
Tel: (212) 643-0500
Fax: (212) 253-4272
mreese@reesellp.com

George V. Granade*
REESE LLP
8484 Wilshire Boulevard, Suite 515
Los Angeles, California 90211
Tel: (310) 393-0070
Fax: (212) 253-4272
ggranade@reesellp.com

Charles D. Moore*
REESE LLP
100 South 5th Street, Suite 1900
Minneapolis, Minnesota 55402
Tel: (212) 643-0500
Fax: (212) 253-4272
cmoore@reesellp.com

*Interim Co-Lead Counsel for the
California Subclass*

James J. Pizzirusso*
HAUSFELD LLP
888 16th Street, N.W.
Suite 300
Washington, D.C. 20006
Tel.: (202) 540-7200
Fax: (202) 540-7201
jpizzirusso@hausfeld.com

Steven M. Nathan*
HAUSFELD LLP
33 Whitehall Street
Fourteenth Floor
New York, NY 10004
Tel.: (646) 357-1100
Fax: (212) 202-4322
snathan@hausfeld.com

Thomas A. Zimmerman, Jr.*
ZIMMERMAN LAW OFFICES, P.C.
7199 S. Kingery Highway, Unit 1148
Willowbrook, IL 60527
Tel: (312) 440-0020
Fax: (312) 440-4180
tom@attorneyzim.com

*Chairs of the Plaintiffs’
Executive Committee*

Sabita J. Soneji*
Cort T. Carlson*
TYCKO & ZAVAREEI LLP
1970 Broadway, Suite 1070
Oakland, CA 94612
Tel: (510) 254-6808
Fax: (202) 973-0950
ssoneji@tzlegal.com
ccarlson@tzlegal.com

Robert C. Schubert*
Amber L. Schubert*
**SCHUBERT JONCKHEER &
KOLBE LLP**
2001 Union Street, Suite 200
San Francisco, CA 94123
Tel: (415) 788-4220
Fax: (415) 788-0161
rschubert@sjk.law
aschubert@sjk.law

Laura Van Note*
COLE & VAN NOTE
555 12th Street, Suite 2100
Oakland, CA 94607
Tel: (510) 891-9800
Fax: (510) 891-7030
lvn@colevannote.com
cab@colevannote.com

Michael Kind*
KIND LAW
8860 South Maryland Parkway, Suite 106
Las Vegas, NV 89123
Tel: (702) 337-2322
Fax: (702) 329-5881
Email: mk@kindlaw.com

Marc E. Dann*
Brian D. Flick*
DANNLAW
15000 Madison Avenue
Lakewood, OH 44107
Tel: (216) 373-0539

Fax: (216) 373-0536
notices@dannlaw.com

Francis A. Bottini, Jr.*
BOTTINI & BOTTINI, INC.
7817 Ivanhoe Ave., Suite 102
La Jolla, CA 92037
Tel: (858) 914-2001
Fax: (858) 914-2002
fbottini@bottinilaw.com
achang@bottinilaw.com

Plaintiffs' Executive Committee

***Counsel for the Plaintiffs and the
Proposed Settlement Class Members***

LOCAL RULE 7.1(a)(2) CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), counsel for Plaintiffs conferred with counsel for Defendant before filing this motion, and Defendant agrees the relief requested.

Dated: May 18, 2026

/s/ Nathaniel L. Orenstein
Nathaniel L. Orenstein

CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system and sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on May 18, 2026.

Dated: May 18, 2026

/s/ Ian McLoughlin
Ian J. McLoughlin