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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Christine Head, *on behalf of herself and*)
Others similarly situated,)
)
Plaintiff,)
)
v.)
)
Citibank, N.A.,)
)
Defendant.)
_____)

No.: 3:18-cv-08189-ROS

**ORDER DIRECTING
PRODUCTION OF DATA FOR
PURPOSES OF CLASS NOTICE**

During the June 22, 2022 status conference, this Court ordered Citibank, N.A. (“Citibank”) to produce data necessary to effectuate class notice. To that end, the Court directed Christine Head (“Plaintiff”) and Citibank (collectively, the “Parties”) to submit a proposed order regarding the same.

IT IS ORDERED that, on or before August 5, 2022, Plaintiff must establish that KCC has an information security plan sufficient to comply with the data security regulations of the Gramm-Leach Bliley Act, as updated on December 9, 2021. The parties are directed to meet and confer over any disputes regarding the sufficiency of KCC’s information security plan.

Within 30 days of KCC establishing its sufficient information security plan, Citibank must produce directly to KCC, in a manner and format to be mutually agreed upon by the Parties and KCC: (1) all cellular telephone numbers in Citibank’s Contact Utilities Database to which Citibank attempted to deliver a prerecorded message in connection with

1 a past-due credit card account during the class period that reflect a change of phone
2 indicator code to “B” or “N” between November 2, 2017 and January 28, 2022; and (2) the
3 date(s) of the phone indicator change(s). At the same time, Citibank must notify Plaintiff
4 of the number of unique telephone numbers it provided to KCC and an explanation of its
5 process for gathering the telephone numbers and associated name, address, and account
6 number information. The Parties are directed to meet and confer in good faith regarding
7 any disputes over the process implemented.

8 Within 60 days of Citibank’s production, KCC must complete reverse look ups of
9 the telephone numbers provided by Citibank in the manner described by Plaintiff in the
10 documents submitted in support of her renewed motion for class certification. KCC must
11 provide all resulting data from its reverse look ups to Citibank. At the same time, KCC
12 must provide an explanation of its process for the reverse look ups. The Parties are directed
13 to meet and confer in good faith regarding any disputes over the process implemented and
14 the parameters for the reverse look ups.

15 Within 60 days of KCC’s final production of the reverse look up data, Citibank must
16 notify Plaintiff and KCC of the names that are not identified as name and address matches
17 to its customers or authorized users. At the same time, Citibank must provide an
18 explanation of its process for examining this data. The Court and Parties recognize that
19 some name and address matches may be inexact. The Parties are directed to meet and
20 confer in good faith regarding any disputes over the process implemented and the
21 parameters for determining name and address matches for class notice purposes.

22 The Parties must file a status report every 30 days from the date of this Order. The
23 Parties may request additional time to complete each task, but such requests should be
24 made prior to the current deadline absent extraordinary circumstances. Should the Parties
25 be unable to agree on any meet and confer issue, they are directed to seek Court
26 intervention within 14 days of any impasse.

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