

January 4, 2026

VIA ELECTRONIC MAIL TO COMMENTS.MAILBOX@NJCOURTS.GOV

Honorable Michael J. Blee, J.A.D.
Acting Administrative Director of the Courts
Attention: MCL Application – Daniel’s Law Litigation
Richard J. Hughes Justice Complex, P.O. Box 307
25 Market Street
Trenton, New Jersey 08625-0037

Re: Notice to the Bar (December 3, 2025)
MCL Application - Daniel's Law Litigation

Dear Judge Blee:

This firm represents defendants in Daniel’s Law matters.

I write on behalf of the 70 defendants in pending Daniel’s Law cases listed on the attached Appendix A (collectively, the “Listed Defendants”) to express support for and adoption of the opposition to the application of Plaintiff Atlas Data Privacy Corporation and several individual Plaintiffs to establish a multicounty litigation (“MCL”) for the 111 Daniel’s Law cases currently pending in vicinages throughout the State submitted by Troutman Pepper Locke LLP and McCarter & English LLP on January 2, 2026 (the “January 2, 2026 Opposition”). The Listed Defendants do not include and are in addition to the fourteen Daniel’s Law defendants on whose behalf the January 2, 2026 Opposition was submitted.

For the reasons stated in the January 2, 2026 Opposition, among others, the Listed Defendants oppose the formation of an MCL for these cases.

We thank the Court for its attention to this matter.

Respectfully,



Scott S. Christie

Encl.

Appendix A

Listed Defendants	Pending Daniel's Law Cases
People Data Labs, Inc.	<i>Atlas Data Privacy Corporation, et al. v. People Data Labs, Inc., et al.</i> , Case No. MON-L-000515-24
TelTech Systems, Inc. Epic Applications LLC i/p/a Epic Enterprises LLC	<i>Atlas Data Privacy Corporation, et al. v. TelTech Systems, Inc., et al.</i> , Case No. MID-L-000859-24
Dynata, LLC	<i>Atlas Data Privacy Corporation, et al. v. Dynata, LLC, et al.</i> , Case No. MER-L-000308-24
Vericast Corp. Valassis Digital Corp. Valassis Communications, Inc.	<i>Atlas Data Privacy Corporation, et al. v. Valassis Digital Corp., et al.</i> , Case No. MER-L-000290-24
Swordfish AI Inc.	<i>Atlas Data Privacy Corporation, et al. v. Swordfish AI Inc., et al.</i> , Case No. BER-L-000784-24
The Lifetime Value Co., LLC BeenVerified, LLC NeighborWho LLC The NumberGuru, LLC Peoplelooker, LLC PeopleSmart LLC Ownerly, LLC	<i>Atlas Data Privacy Corporation, et al. v. The Lifetime Value Co., LLC, et al.</i> , Case No. MER-L-000272-24
InsideRE, LLC	<i>Atlas Data Privacy Corporation, et al. v. InsideRE, LLC, et al.</i> , Case No. MID-L-000991-24

RE/MAX, LLC	<i>Atlas Data Privacy Corporation, et al. v. RE/MAX, LLC, et al.</i> , Case No. BER-L-000871-24
Trans Union LLC Neustar, Inc. TransUnion Risk and Alternative Data Solutions, Inc.	<i>Atlas Data Privacy Corp., et al. v. Trans Union, LLC, et al.</i> , Case No. BER-L-000810-24
PeopleConnect, Inc. PeopleConnect Holdings, Inc. Intelius, LLC PeopleConnect Intermediate, LLC)	<i>Atlas Data Privacy Corp., et al. v. PeopleConnect, Inc., et al.</i> , Docket No. MON-L-000484-24
Epsilon Data Management, LLC on its own behalf and as successor by merger to Citrus Ad International, Inc. Conversant LLC	<i>Atlas Data Privacy Corporation, et al. v. Epsilon Data Management, LLC, et al.</i> , Case No. MON-L-000533-24
Telnyx LLC	<i>Atlas Data Privacy Corporation, et al. v. Telnyx LLC, et al.</i> , Case No. MRS-L-000260-24
Blackbaud, Inc.	<i>Atlas Data Privacy Corp., et al. v. Blackbaud, Inc., et al.</i> , Case No. MRS-L-000243-24
CheckPeople, LLC	<i>Atlas Data Privacy Corporation, et al. v. CheckPeople, LLC, et al.</i> , Case No. MON-L-000506-24
Giant Partners, Inc.	<i>Atlas Data Privacy Corporation, et al. v. Giant Partners, Inc., et al.</i> , Case No. MID-L-000989-24
Social Catfish, LLC	<i>Atlas Data Privacy Corporation, et al. v. Social Catfish, LLC, et al.</i> , Case No. BER-L-000769-24
Unmask, LLC	<i>Atlas Data Privacy Corporation, et al. v. Unmask, LLC, et al.</i> , Case No. BER-L-000815-24

Wiland, Inc.	<i>Atlas Data Privacy Corporation, et al. v. Wiland, Inc., et al.</i> , Case No. MON-L-000577-24
Commercial Real Estate Exchange, Inc.	<i>Atlas Data Privacy Corporation, et al. v. Commercial Real Estate Exchange, Inc., et al.</i> , Case No. MRS-L-000271-24
Babel Street, Inc.	<i>Atlas Data Privacy Corporation, et al. v. Babel Street Inc., et al.</i> , Case No. ESX-L-007260-24
Constella Intelligence, Inc.	<i>Atlas Data Privacy Corporation, et al. v. Constella Intelligence, Inc., et al.</i> , Case No. ESX-L-007212-24
Lusha Systems, Inc.	<i>Atlas Data Privacy Corporation, et al. v. Lusha Systems, Inc., et al.</i> , Case No. BER-L-000814-24
Claritas, LLC	<i>Atlas Data Privacy Corporation, et al. v. Claritas, LLC, et al.</i> , Case No. BER-L-000868-24
Specialists Marketing Services, Inc.	<i>Atlas Data Privacy Corporation, et al. v. Specialists Marketing Services, Inc., et al.</i> , Case No. MON-L-000539-24
Outside Interactive, Inc.	<i>Atlas Data Privacy Corporation, et al. v. Outside Interactive, Inc., et al.</i> , Case No. MID-L-000849-24
BatchService, LLC	<i>Atlas Data Privacy Corporation, et al. v. BatchService, LLC, et al.</i> , Case No. MON-L-000485-24
ATTOM Data Systems, LLC	<i>Atlas Data Privacy Corporation, et al. v. ATTOM Data Systems, LLC, et al.</i> , Case No. MER-L-000273-24
Search Quarry, LLC Search Quarry, Inc.	<i>Atlas Data Privacy Corporation, et al. v. Search Quarry, LLC, et al.</i> , Case No. MON-L-000516-24
Infopay, Inc.	<i>Atlas Data Privacy Corporation, et al. v. Infopay, Inc., et al.</i> , Case No. MID-L-000815-24
Buildout, Inc.	<i>Atlas Data Privacy Corporation, et al. v. LTRAC, LLC, et al.</i> , Case No. MON-L-000694-24

<p>Equifax Inc. Equifax Information Services LLC Equifax Consumer Services LLC Equifax Workforce Solutions LLC Equifax Data Services LLC Appriss Insights, LLC Kount Inc. DataX Ltd. IXI Corporation Securitec Screening Solutions LLC</p>	<p><i>Atlas Data Privacy Corporation, et al. v. Equifax Inc., et al.</i>, Case No. BER-L-000919-24</p>
<p>FindPeopleSearch, LLC</p>	<p><i>Atlas Data Privacy Corporation, et al. v. FindPeopleSearch, LLC, et al.</i>, Case No. UNN-L-001740-25</p>
<p>TopHap, Inc.</p>	<p><i>Atlas Data Privacy Corporation, et al. v. TopHap, Inc., et al.</i>, Case No. UNN-L-1747-25</p>
<p>6Sense Insights, Inc.</p>	<p><i>Atlas Data Privacy Corporation, et al. v. 6Sense Insights, Inc., et al.</i>, Case No. MID-L-000988-24</p>
<p>First American Financial Corp.</p>	<p><i>Atlas Data Privacy Corporation, et al. v. First American Financial Corp., et al.</i>, Case No. MID-L-000915-24</p>
<p>Microbilt Corp.</p>	<p><i>Atlas Data Privacy Corporation, et al. v. Microbilt Corp., et al.</i>, Case No. ESX-L-003308-25</p>
<p>CoStar Group, Inc. CoStar Realty Information, Inc.</p>	<p><i>Atlas Data Privacy Corp., et al. v. CoStar Group, Inc., et al.</i>, Case No. BER-L-000770-24</p>
<p>Thryv, Inc.</p>	<p><i>Atlas Data Privacy Corp., et al. v. Thryv, Inc., et al.</i>, Case No. MRS-L-000261-24</p>

Lightbox Parent, L.P. Lightbox Holdings, L.P.	<i>Atlas Data Privacy Corp., et al. v. Lightbox Parent, L.P., et al.</i> , Case No. MER-L-000309-24
Vonage Holdings Corp. Vonage Business, Inc. Vonage America LLC	<i>Atlas Data Privacy Corp., et al. v. Vonage Holdings Corp., et al.</i> , Case No. ESX-L-007208-24
Verisk Analytics, Inc.	<i>Atlas Data Privacy Corp., et al. v. Verisk Analytics, Inc., et al.</i> , Case No. MID-L-000903-24