

CANADA

PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

No: 500-06-001392-253

SUPERIOR COURT
(Class Action)

MAME ABDOU AZIZ DIOP

Plaintiff

v.

ROCKETREACH LLC

Defendant

SWORN STATEMENT OF SCOTT KIM

I, the undersigned, Scott Kim, CEO, exercising my profession at RocketReach LLC, located at 144 N 7th, Brooklyn, New York, 11211, United States, solemnly declare that:

INTRODUCTION

1. I am the Chief Executive Officer at RocketReach LLC since 2020. I have been employed at RocketReach LLC since 2020.
2. In this role, I have knowledge and understanding of the company's business practices.
3. I have read an unofficial English translation of the *Demande pour autorisation d'exercer une action collective et pour être désigné représentant* dated June 27, 2025 (the "**Application**"), and I have knowledge surrounding the facts alleged.

OVERVIEW OF THE DEFENDANT

A. RocketReach LLC

1. RocketReach LLC operates the RocketReach database and intelligence platform ("**RocketReach**"), which is the subject of these proceedings.

2. RocketReach LLC is a US limited liability corporation registered under the laws of Wyoming.
3. RocketReach LLC does not have establishments in the Province of Quebec.

DESCRIPTION OF ROCKETREACH'S OPERATIONS

1. RocketReach is a professional directory that provides its users with access to detailed company and business contact information. RocketReach users consist primarily of businesses seeking to connect with other professionals for marketing, sales and career opportunities.
2. RocketReach LLC obtains business contact information from various sources for professional and business purposes. This information – such as name, company name and description, company phone number, work email, job title, and company address – is collected through various sources, including but not limited to aggregation from publicly accessible sources, including company websites, professional profiles, and public government records. Some information is not collected but rather algorithmically-generated based on other data points available. The business information on the RocketReach directory is generally available in the public domain or shared by individuals in a professional context.
3. RocketReach LLC does not collect nor retain personal information such as, among other categories, sexual orientation, religion, political affiliations, health information, biometric data, or consumer financial information.
4. RocketReach LLC employs safeguards designed to exclude personal email addresses and personal mobile phone numbers that are not used in a professional context.

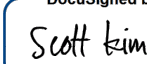
MAME ABDOU AZIZ DIOP

1. Plaintiff's RocketReach profile is limited to business contact information, such as his name, employer, work history and educational background. It also contains

algorithmically-generated information such as his work email address. There is no phone number associated with Plaintiff on his RocketReach profile.

2. To the best of my knowledge, Mame Abdou Aziz Diop has not exercised his right to request the removal or deletion of his profile from RocketReach. At all relevant times, this functionality was in effect and available to him.
3. I affirm that the information compiled to create Mame Abdou Aziz Diop's RocketReach profile, when considered in isolation, does not possess any intrinsic economic value. Rather, any value to our users arises from the RocketReach database as a whole, which functions as a comprehensive and integrated resource.
4. All the facts alleged herein are true to the best of my knowledge, information, and belief.

AND I HAVE SIGNED:

DocuSigned by:

39F4FD85995545E...

SCOTT KIM

Solemnly declared before me by
technological means in Montreal, Québec,
on this 18th day of December 2025



#126844

Commissioner of Oaths for the Province
of Quebec

Confirmation de la transmission des documents



Succès

Vos documents ont bien été transmis.

Numéro de demande : 2025-PROC-00441018

Date et heure de transmission : 2025-12-21 18:29:02

Numéro de dossier judiciaire : 500-06-001392-253

Titre : Sworn Statement of Scott Kim

Aucun courriel de confirmation ne sera transmis. Il est recommandé d'imprimer cette page en vue de conserver ces informations pour vos dossiers.

Si des frais judiciaires sont prescrits pour le dépôt d'un acte de procédure ou d'un document, celui-ci ne sera légalement reçu que lorsque les frais judiciaires auront été acquittés en totalité. Le cas échéant, le greffe vous transmettra un avis de paiement par courriel.

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Québec

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SWORN STATEMENT OF SCOTT KIM

ORIGINAL

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