

APPENDIX 3

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
Charlotte Division**

KEVIN TRUONG, individually and on	:	
behalf of a class of all persons and entities	:	Case No. 3:23-cv-00079-MOC-DCK
similarly situated;	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
TRUIST BANK,	:	
	:	
Defendant.	:	

Declaration of Kevin Truong

1. My name is Kevin Truong and I am the Plaintiff in this action.
2. I am over the age of 18 and I have personal knowledge about the matters stated herein.
3. I submit this declaration in support of the Motion for Preliminary Approval of the class action settlement agreement with the defendant, Truist Bank.
4. I filed this action because I received repeated robocalls from Truist concerning multiple Truist accounts that had nothing to do with me. I did not request these calls and I understand that robocalls are strictly regulated under federal law, including the Telephone Consumer Protection Act (TCPA), 47 U.S.C. § 227.
5. I am seeking to hold Truist accountable for its actions and to obtain relief for others who received similar robocalls from Truist as well.
6. I understand that that settlement agreement provides relief for a class defined as follows:

The subscribers or regular users of the 5,998 telephone numbers assigned to cellular telephone service in the United States to which Truist placed a

prerecorded telephone call concerning an unrelated account between February 10, 2019, and August 31, 2022.

7. I am willing and able to be a representative for the class.

8. I have worked closely with my attorneys to prosecute this action to the best of my ability. Before retaining counsel, I researched my legal claims and searched for attorneys experienced in bringing TCPA actions.

9. I reviewed and provided input on the complaint, have monitored the filings in this actions, and have maintained regular communications with my attorneys throughout the case.

10. I have also assisted counsel with discovery, and searched for and provided numerous documents to my attorneys for production in discovery.

11. As part of that discovery, Truist subpoenaed my former employer for my employment records, and my telephone service providers for records of my telephone communications. I was willing to proceed with this action despite the personal nature of these records because I believe in my claims and the claims of the class.

12. I also assisted counsel in settlement negotiations with Truist on behalf of the class, and traveled to New York for a mediation of this matter.

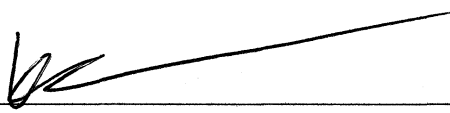
13. To my knowledge, I have no interests antagonistic to those of the class members. I believe my interests are entirely consistent with the class members' interests because we all received robocalls concerning unrelated Truist accounts, and I seek to remedy Truist's common violation of our rights under the TCPA.

14. I understand that as a class representative I have the responsibility to consider the class's interests when making any decisions about the case and make all such decisions in the interests of the class, not just my own interests.

15. I have reviewed the settlement agreement, and believe it provides substantial relief to the class and is a good result for this case.

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

Executed at Georgetown, Texas this 11th day of April, 2025.
City



Kevin Truong