

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

SIOBHAN MORROW and TRACEE LE  
FLORE, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

NAVY FEDERAL CREDIT UNION,

Defendant.

Case No. 1:21-cv-722-MSN-LRV

MARIA HART and TRACEE LE FLORE,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

NAVY FEDERAL CREDIT UNION,

Defendant.

Case No. 1:22-cv-844-MSN- LRV

**DECLARATION OF VIVIAN BARNETT IN SUPPORT OF JOINT OPPOSITION TO  
NON-PARTY CARTLON XAVIER MATHEWS’ MOTION FOR JOINDER**

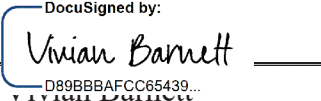
I, Vivian Barnett, declare as follows:

1. I am a Savings and Checking Specialist III of Savings & Checking Operations at Navy Federal Credit Union (“Navy Federal”), the Defendant in the above-captioned action. I have personal knowledge of the facts set forth in this declaration and, if called upon as a witness, I could and would testify to such facts under oath.

2. I submit this declaration in support of the Parties' Joint Opposition to Non-Party Carlton Xavier Mathews' Motion for Joinder (Dkt. No. 248)
3. I have reviewed Navy Federal's member account records for Mr. Carlton Xavier Mathews by identifying a member with the same name and date of birth as the movant, who also had a Florida address associated with the account.
4. Mr. Mathews became a Navy Federal member when he opened a savings account with Navy Federal on March 14, 2013.
5. On September 3, 2013, Navy Federal closed his account pursuant to Navy Federal's banking and account policies as Mr. Mathew's account was holding a zero balance.
6. Mr. Mathews was never assessed an International Service Assessment Fee.
7. Mr. Mathews has not held a Navy Federal account since September 3, 2013 and is currently not a Navy Federal member.
8. There is no other Carlton Mathews in Navy Federal's member account records that had an account open between August 2016 and the present.

I declare under penalty perjury under the laws of the United States of America that the foregoing facts are true.

Dated: July 5, 2024  
Vienna, Virginia

By:   /s/                
DocuSigned by:  
Vivian Barnett  
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