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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF ORANGE – CIVIL COMPLEX CENTER**

KEVIN FLORES, individually, and on behalf of
other members of the general public similarly
situated and on behalf of other aggrieved
employees pursuant to the California Private
Attorneys General Act;

Plaintiff,

vs.

PACIFIC PLASTICS, INC., a California
corporation; and DOES 1 through 100,
inclusive,
Defendants.

Case No: 30-2021-01214613-CU-OE-CXC

Honorable Randall J. Sherman
Department CX-105

CLASS ACTION

**DECLARATION OF LINDSAY ROMO
REGARDING NOTICE AND
SETTLEMENT ADMINISTRATION**

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DECLARATION OF LINDSAY ROMO

I, LINDSAY ROMO, hereby declare:

1. I am employed as a Senior Project Manager by Simpluris, Inc. (“Simpluris”), the claims administrator in the above-entitled action. Our Corporate Office address is 3194-C Airport Loop Dr., Costa Mesa, CA 92626. My telephone number is (714) 640-5635. I am over twenty-one years of age and authorized to make this declaration on behalf of Simpluris and myself.

2. Simpluris is a Class Action Settlement Administration company located in Costa Mesa, California. It was founded by individuals who have each managed thousands of settlements, along with professionals in the areas of Software Development, Third-Party Claims Administration, Mail-House Operations, and Call Center Support Management.

3. Simpluris was approved by Counsel for Kevin Flores (“Plaintiff”), and Pacific Plastics, Inc (“Defendant”), (collectively the “Parties”), to provide settlement administration services in the *Kevin Flores v. Pacific Plastics, Inc* case (“Settlement”). In this capacity, Simpluris was charged with (a) establishing and maintaining a related settlement fund account; (b) establishing and maintaining a calendar of administrative deadlines and responsibilities; (c) processing and mailing payments to the Plaintiff, Class Counsel and Class Members; (d) translating, printing and mailing the Notice of Class Action Settlement to Class Members in English and Spanish; (e) receiving and validating Requests for Exclusion, Objections or Workweeks Disputes submitted by Class Members; (f) calculating employer payroll taxes and providing appropriate forms and calculations to Defendant; (g) mailing settlement checks; (h) providing counsel with weekly reports; and (i) other tasks as the Parties mutually agree or the Court orders Simpluris to perform.

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TOLL-FREE TELEPHONE HELPLINE

4. A toll-free telephone number was included in the Notice of Class Action Settlement for the purpose of allowing the Class Members to call Simpluris and to make inquiries regarding the Settlement. The system is accessible 24 hours a day, 7 days a week, and will remain in operation throughout the settlement process. Callers have the option to speak with a live call center representative during normal business hours or to leave a message and receive a return call during non-

1 business hours. Spanish-speaking representatives are available during normal business hours. The toll-
2 free telephone number included in the Notice of Class Action Settlement was (888) 369-3780 and was
3 live on May 29, 2025.

4 NOTIFICATION TO THE CLASS

5 5. On April 15, 2025, Simpluris received the Court-approved Notice of Class Action
6 Settlement (hereafter “Class Notice”). The Class Notice advised Class Members of their right to request
7 exclusion from the Class Settlement, object to the Class Settlement, dispute Workweeks, do nothing,
8 and the implications of each such action. The Class Notice advised Class Members of applicable
9 deadlines and other events, including the Final Approval Hearing, and how Class Members could
10 obtain additional information.

11 6. On May 14, 2025, Defendant’s Counsel provided Simpluris a Class List containing each
12 Class Member’s and Aggrieved Employee’s full names, last known mailing addresses, Social Security
13 Numbers, and such other information as was necessary for Simpluris to calculate Workweeks during
14 the Class Period and PAGA Period with Defendant during the Class Period. The Class List contained
15 data for four hundred and forty-three (443) individuals.

16 7. The mailing addresses contained in the Class List were processed and updated utilizing
17 the National Change of Address Database (“NCOA”) maintained by the U.S. Postal Service. The
18 NCOA contains requested changes of address filed with the U.S. Postal Service. In the event that any
19 individual had filed a U.S. Postal Service change of address request, the address listed with the NCOA
20 would be utilized in connection with the mailing of the Class Notice. Simpluris was able to locate
21 thirty-three (33) updated addresses using NCOA prior to the mailing of the Class Notice.

22 8. On May 29, 2025, the Class Notice was mailed to four hundred and forty-three (443)
23 individuals identified as Class Members, of the 443 Class Members, one hundred and forty-nine (149)
24 were identified as Aggrieved Employees. The Class Notice was mailed via First Class in both English
25 and Spanish. A copy of the Class Notice is attached hereto as **Exhibit A**.

26 9. A total of eighty-one (81) Class Notices were returned to Simpluris. Of these, none (0)
27 were returned with a forwarding address. If a Class Member’s Class Notice was returned by the USPS
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1 as undeliverable and without a forwarding address, Simpluris performed an advanced address search
2 (i.e. skip trace) on all of these addresses by using Accurant, a reputable research tool owned by Lexis-
3 Nexis. Simpluris used the Class Member's name and previous address to locate a current address.
4 Through the advanced address searches, Simpluris was able to locate seventy-two (72) updated
5 addresses and Simpluris promptly mailed a Class Notice to those updated addresses. Ultimately, there
6 are nine (9) Class Notices that remain undeliverable.

7 10. The Escalator Clause of the Settlement Agreement indicates if the actual number of
8 Workweeks exceeds 29,065 by more than 7.5%, Defendant shall increase the Gross Settlement Amount
9 on a proportional basis to the extent the threshold is exceeded e.g., if the threshold referenced herein is
10 exceeded by 1%, the Gross Settlement Amount will increase by 1%. The total number of Workweeks
11 during this period was thirty one thousand two hundred and eleven (31,211), which does not exceed the
12 Escalator Clause. Therefore, the Escalator Clause is not triggered and the Gross Settlement Amount
13 remains \$1,750,000.

14 **REQUESTS FOR EXCLUSION, OBJECTIONS AND DISPUTES**

15 11. The deadline for Class Members to submit a Request for Exclusion from the Class
16 Settlement, Object to the Class Settlement, or Workweeks Dispute is July 28, 2025.

17 12. As of this date, Simpluris has not received any Requests for Exclusion from the Class
18 Settlement from Class Members.

19 13. As of this date, Simpluris has not received any Objections to the Class Settlement from
20 Class Members.

21 14. As of this date, Simpluris has not received any Workweeks Disputes from Class
22 Members or Aggrieved Employees.

23 **CLASS MEMBER AWARDS**

24 15. As of this date, there are four hundred and forty-three (443) Settlement Class Members
25 who will be paid their portion of the Net Settlement Fund. Of these, one hundred and forty-nine (149)
26 are also Aggrieved Employees will also be paid out of the Employee PAGA Fund.
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16. The Net Settlement Fund of \$856,320.74 available to pay Settlement Class Members was determined by subtracting the Attorneys' Fees (\$612,500.00), Attorneys' Costs (\$12,179.26), Incentive Payment (\$7,500.00), PAGA Penalties \$187,500.00, individual PAGA awards of \$62,500.00 and the Administration Costs (\$11,500.00) from the Gross Settlement Sum of \$1,750,000.00.

17. The *average estimated Individual Settlement Payment* is \$1,933.00, the *highest estimated Individual Settlement Payment* is \$9,355.85, and the *lowest estimated Individual Settlement Payment* is \$27.44.

18. As of this date, there are one hundred and forty-nine (149) Aggrieved Employees who will be paid their portion of the Employee PAGA Amount of \$62,500.00.

19. The *average estimated Individual PAGA Payment* is \$419.46, the *highest estimated Individual PAGA Payment* is \$607.03, and the *lowest estimated Individual PAGA Payment* is \$8.09.

ADMINISTRATION COSTS

20. Simpluris' total costs for services in connection with the administration of this Settlement, including fees incurred and anticipated future costs for completion of the administration, are \$11,500.00. Simpluris' work in connection with this matter will continue with the calculation of the settlement checks, issuance and mailing of those settlement checks, etc., and to do the necessary tax reporting on such payments.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 9th day of September 2025, in Irvine, California.

L. P. Rans

Lindsay Romo