

# **EXHIBIT A**

**DECLARATION OF MARY BUTLER ON  
BEHALF OF SIMPLURIS, INC., REGARDING  
NOTICE AND SETTLEMENT  
ADMINISTRATION [Dkt. 54-13]**

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the conditionally certified Class

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

LUBEN ROMONOV, on behalf of  
himself and all others similarly situated,

Plaintiff,

v.

AMAZON.COM SERVICES LLC, a  
Delaware limited liability company; and  
DOES 1 through 20, inclusive,

Defendants.

Case No. 2:20-cv-02692 (KSx)

**DECLARATION OF MARY BUTLER  
ON BEHALF OF SIMPLURIS, INC.,  
REGARDING NOTICE AND  
SETTLEMENT ADMINISTRATION**

**DECLARATION OF MARY BUTLER**

I, MARY BUTLER, declare the following facts to be true and correct and if called as a witness would testify competently to the same:

1. I am employed as a Case Manager by Simpluris, Inc. (“Simpluris”), the claims administrator in the above-entitled action. My business address is 3194-C Airport Loop Drive, Costa Mesa, CA 92626. My telephone number is (714) 640-5643. I am over 21 years of age and authorized to make this declaration on behalf of Simpluris and myself.

2. Simpluris is a class action Settlement Administration Company headquartered in Costa Mesa, California. It was founded by individuals who have each managed hundreds 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 appointed by the Court as Settlement Administrator to administer the Settlement in accordance with the terms of the Class and Representative Action Settlement Agreement, (the “Settlement”). Simpluris has been responsible, among other things, for: (a) printing and mailing the Notice of Class Action Settlement and Change of Address Form (“Notice Packet”); (b) receiving undeliverable Notice Packets; (c) receiving and requests for exclusion; (d) and answering questions from Class Members. If the Court grants final approval of the Settlement, Simpluris will be responsible, among other things, for: (e) calculating individual Settlement payments, distributing funds, and tax-reporting following final approval; (f) mailing Settlement checks; (g) and for such other tasks as the Parties mutually agree or the Court orders Simpluris to perform.

**TOLL FREE TELEPHONE HELPLINE**

4. A toll-free telephone number was included in the Class Notice for the purpose of allowing the Class Members to call Simpluris and to make inquiries

1 regarding the Settlement. The system is accessible 24 hours a day, 7 days a week, and  
2 will remain in operation throughout the settlement process. Callers have the option to  
3 speak with a live call center representative during normal business hours or to leave a  
4 message and receive a return call during non-business hours. The toll-free telephone  
5 number included in the Class Notice was 1-866-612-9330.

6 **NOTIFICATION TO THE CLASS**

7  
8 5. On October 21, 2021, Simpluris received the Court-approved Notice  
9 Packet from Plaintiffs' Counsel. The Notice Packet advised Class Members of their  
10 right to opt out from the Settlement, object to the Settlement, or do nothing, and the  
11 implications of each such action. The Notice Packet advised Class Members of  
12 applicable deadlines and other events, including the Final Approval Hearing, and how  
13 Class Members could obtain additional information. A true and correct copy of the  
14 content of the Notice Packet is attached hereto as "**Exhibit A**".

15 6. On November 19, 2021, Counsel for Defendant provided Simpluris with  
16 a mailing list containing the name, last known address, Social Security Number, and  
17 pertinent employment information during the Class Period for the Class Members.  
18 The Class List contained data for 4,983 unique Class Members.

19 7. The mailing addresses contained in the Class List were processed and  
20 updated utilizing the National Change of Address Database ("NCOA") maintained by  
21 the U.S. Postal Service. The NCOA contains changes of address filed with the U.S.  
22 Postal Service. In the event that any individual had filed a U.S. Postal Service change  
23 of address request, the address listed with the NCOA was utilized in connection with  
24 the mailing of the Notice Packets.

25 8. On December 10, 2021, after updating the mailing addresses through the  
26 NCOA, Notice Packets were mailed via First Class Mail to 4,983 Class Members  
27 contained in the Class List.  
28

1           9. As of this date, 342 Notice Packets were returned by the post office. For  
2 those without a forwarding address, Simpluris performed an advanced address search  
3 (i.e. skip trace) on all of these addresses by using Accurint, a reputable research tool  
4 owned by Lexis-Nexis. Simpluris used the Class Member's name, previous address and  
5 Social Security number to locate a more current address. Two hundred ninety-eight  
6 (298) Notice Packets were re-mailed to either a newfound address, with forwarding  
7 addresses provided by the United States Postal Service or at the request of the Class  
8 Member. Class Members who receive a remailed Notice Packet have an additional 20  
9 days to opt out or dispute the workweek information. Ultimately, after additional  
10 searches, 44 Notice Packets are undeliverable because Simpluris was unable to find a  
11 better address.

12                           **DISPUTES, EXCLUSIONS, OBJECTIONS, AND CHANGE OF**  
13                                           **ADDRESS FORMS**

14           10. Class Members have until February 8, 2022, to submit a dispute. Class  
15 Members who received a remailed Notice Packet will have until February 28, 2022 to  
16 submit a dispute. As of this date, Simpluris has received no disputes.

17           11. Class Members have until February 8, 2022, to submit a request for  
18 exclusion. Class Members who received a remailed Notice Packet will have until  
19 February 28, 2022 to submit a request for exclusion. As of this date, Simpluris has  
20 received no requests for exclusion from the Settlement.

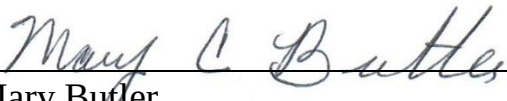
21           12. Class Members have until February 8, 2022, to submit written objections.  
22 Class Members who received a remailed Notice Packet will have until February 28,  
23 2022 to submit written objections. As of this date, Simpluris has not received any  
24 written objections. (The Agreement provides that Class Members may appear at the  
25 Final Approval Hearing even if they have not returned a written objection. Settlement  
26 Agreement, page 13, paragraph (a).)

27           13. To date, Class Members have returned 59 change of address forms.  
28

**ADMINISTRATION COSTS**

14. 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 \$25,000.00. Simpluris' work in connection with this matter will continue following approval of the Settlement with the calculation of the Settlement checks, issuance and mailing of those Settlement checks, and others as ordered by the Court, etc., and to do the necessary tax reporting on such payments.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 20<sup>th</sup> day of January, 2022, at Frisco, TX.

  
Mary Butler