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Counsel for Plaintiff Luben Romanov, and
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)

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

Date: March 25, 2022

Time: 8:30 a.m.

Ctrm: 6C

Judge: Stanley Blumenfeld, Jr.

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1 additional searches, 44 Notice Packets are undeliverable because Simpluris was unable
2 to find better addresses.

3 **DISPUTES, EXCLUSIONS, OBJECTIONS, AND CHANGE OF**
4 **ADDRESS FORMS**

5 5. Class Members have until February 8, 2022, to submit a dispute. Class
6 Members who received remailed Notice Packets will have until February 28, 2022 to
7 submit disputes. As of this date, Simpluris has received no disputes.

8 6. Class Members have until February 8, 2022, to submit requests for
9 exclusion. Class Members who received remailed Notice Packets will have until
10 February 28, 2022 to submit requests for exclusion. As of this date, Simpluris has
11 received two (2) requests for exclusion from the Settlement from David Won (33 Pay
12 Periods) and Glenn Barrera (8 Pay Periods).

13 7. Class Members have until February 8, 2022, to submit written
14 objections. Class Members who received remailed Notice Packet will have until
15 February 28, 2022 to submit written objections. As of this date, Simpluris has not
16 received any written objections. (The Agreement provides that Class Members may
17 appear at the Final Approval Hearing even if they have not returned a written
18 objection. Settlement Agreement, page 13, paragraph (a).)

19 8. To date, Class Members have returned 77 change of address forms.

20 **BREAKDOWN OF SETTLEMENT FUND**

21 9. As of the date of this declaration, there are 4,981 Participating Class
22 Members who will be paid their portion of the Net Settlement Amount. Furthermore,
23 4,983 of the Class Members are eligible PAGA Members who will receive a portion
24 of the PAGA Payment (\$12,500) allocated to them. The remaining portion of the
25 PAGA Payment (\$37,500) will be paid to the Labor and Workforce Development
26 Agency.
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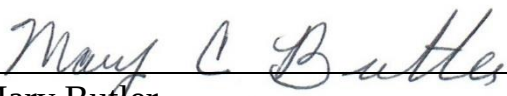
1 10. Pursuant to the Settlement Agreement, the entire Net Settlement Amount
2 was used to calculate the Individual Settlement Payments for all Participating Class
3 Members. The Net Settlement Amount is \$371,532.91 and was calculated as set forth
4 below:

Maximum Settlement Amount	\$700,000.00
<i>Less Attorney Fee Payment (Requested)</i>	<i>-\$233,333.33</i>
<i>Less Cost Award (Requested)</i>	<i>-\$10,133.76</i>
<i>Less Class Representative Service Payment</i>	<i>-\$10,000.00</i>
<i>Less Administration Costs</i>	<i>-\$25,000.00</i>
<u><i>Less PAGA Payment</i></u>	<u><i>-\$50,000.00</i></u>
Net Settlement Amount	\$371,532.91

12 11. As of the date of this declaration, the *highest* Individual Settlement
13 Payment to be paid is estimated at \$500.90 and the *average* Individual Settlement
14 Payment to be paid is estimated at \$77.07. (These figures may change if Simpluris
15 receives any requests for exclusion postmarked on or before February 28, 2022
16 from Class Members whose Notice Packets were remailed.)
17

18 12. Plaintiff Luben Romanovs' Individual Settlement Payment is estimated
19 at \$68.75.

20 I declare under penalty of perjury under the laws of the United States of
21 America that the foregoing is true and correct. Executed this 23rd day of February,
22 2022, at Frisco, Texas.

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25 Mary Butler
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