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Attorneys for Plaintiff
JAIME CAZARES VARGAS

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF KERN

JAIME CAZARES VARGAS, as an individual
and on behalf of others similarly situated,

Plaintiff,

vs.

JTS MODULAR, INC., a California
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. BCV-20-100645-JEB

*[Assigned to Hon. J. Eric Bradshaw Department:
JJ]*

**DECLARATION OF ERIC SPRINGER OF
SIMPLURIS, INC. IN SUPPORT OF
MOTION FOR SETTLEMENT
APPROVAL OF CLAIMS BROUGHT
UNDER THE PRIVATE ATTORNEYS
GENERAL ACT**

Date: April 26, 2022
Time: 8:30 a.m.
Dept.: J

Complaint Filed: March 4, 2020
Trial Date: None Set

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I, ERIC SPRINGER, declare as follows:

1. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so competently under oath.

2. I am employed by Simpluris, Inc. (“Simpluris”), as the Director of Client Services.

3. I personally have over thirteen (13) years of experience in claims management and administration of class and collective action matters.

4. Simpluris has never had any financial interests in nor affiliation with the parties or counsel in the *Jaime Cazares Vargas v. JTS Modular, Inc.*, matter.

SIMPLURIS BACKGROUND AND EXPERIENCE

5. Simpluris has extensive experience in class action matters, having provided services in class action settlements involving antitrust, securities fraud, property damage, employment discrimination, employment wage and hour, product liability, insurance and consumer issues. Simpluris specializes in pre-settlement consultation, data management, legal notification, call center support, claims processing and tax reporting.

6. We have provided notification and/or claims administration services in more than 6,000 cases. Of these, more than 4,000 were Labor & Employment cases. Over the past 12 years, Simpluris has handled approximately \$6 billion in settlements.

7. Simpluris is committed to the security of not only our data and information but the Parties' data and information as well. We have not experienced any security breaches in our company history. A true and correct copy of our SOC 2 Compliance demonstrating our commitment to security is attached as **Exhibit A**. Additionally, Simpluris maintains insurance coverage in the amount of \$3,000,000 for Errors and Omissions.

NOTICE PLAN

8. Simpluris does not have any affiliation with counsel for this matter.

9. Simpluris has been selected by counsel to serve as the Settlement Administrator for this case.

EXHIBIT A

Simpluris Security Summary – White Paper

Simpluris is committed to the security and overall protection of not only our data and information but our client's data and information, as well. As a demonstration of our commitment, we maintain SOC 2 Certification which requires strict adherence to policies and procedures surrounding information security, including processing and storage of confidential customer data. Simpluris supports a comprehensive, written Information Security Program that complies with all applicable laws and regulations (e.g. HIPAA, Gramm-Leach-Bliley Act, MA 201 CMR 17.00) and is designed to (a) ensure the security, privacy and confidentiality of Client and Class Member Information, (b) protect against any reasonably anticipated threats or hazards to the security or integrity of Client or Class Member Information, and (c) protect against unauthorized access to, use, deletion, or modification of Class Member Information. Simpluris has designated specific employees to be responsible for the administration of its Information Security Program. Also, Simpluris regularly and routinely monitors, tests, and updates our Information Security Program.

Simpluris uses Client and Class Member Information only for the purposes for which its' clients provide it, as described in any Agreements or Court Orders governing the provision of Simpluris' services in any particular case. Simpluris maintains a process for identifying, assessing, and mitigating the risks to Class Member Information in each relevant area of Simpluris' operations. At Simpluris, we continuously evaluate the effectiveness of the safeguards for controlling these risks to data and bank accounts. Simpluris restricts access to Class Member Information only to those employees, agents, or subcontractors who need to know the information to perform their jobs. Simpluris performs background checks of all its employees that will have access to Sensitive Personal Information, including a review of their references, employment eligibility, education, and criminal history to ensure they do not pose a risk to the security of Client or Class Member Information.

Simpluris adheres to the following industry best practices to safeguard its systems which process, store or transmit Client and Class Member Information:

- Identity and Access Management;
- Complex passwords are routinely and regularly changed;
- Role-based access control systems to limit individual employee access to network applications and systems based on their particular job role and function;
- Data Loss Prevention and Intrusion Prevention System software at multiple layers to prevent from internal and external threats of data leaks, malicious activity, and policy violations
- Encryption of Class Member Information if transmitted over public or wireless networks (e.g., via email, FTP, the Internet, etc.);
- Implementation of a Secure File Transfer system (using SSL encryption) for transmitting documents back and forth to clients;
- Encryption of servers, portable media, laptops, desktops, smartphones, mobile devices, and new technologies that store Class Member Information;
- Complex password authentication for remote access to Company's networks;
- Upon hire and annually after that, training of all employees with access to Class Member Information, (including any agents, and subcontractors with access to Class Member Information) about their obligations to implement the Information Security Program;
- Strict disciplinary measures for employees who violate the Information Security Program;
- Preventing terminated employees from accessing Class Member Information;
- Appropriately configured and updated firewall, antivirus, and spyware software;
- Prompt application of vendor-recommended security patches and updates to systems and other applications to avoid any adverse impact on Class Member Information;
- Separation of Duties;
- Infrastructure and Physical Security;
- Business Continuity Planning;
- Disaster Recovery Planning

EXHIBIT B



3194-C Airport Loop Drive
Costa Mesa, CA 92626
800-779-2104 www.simpluris.com

Estimate #: 14539
Estimate Date: 3/7/2022

Prepared By: Kimberly Sutherland
Direct Dial #: 321.223.5065
Email: ksutherland@simpluris.com

Plaintiff Attorney

Attorney/Client: **Milan Moore**
Firm: LIDMAN LAW
Email: mmore@lidmanlaw.com

Defense Attorney

Attorney/Client:
Firm:
Email:

Case Name: Jaime Vargas v. JTS PAGA: Distribution Only: Opt Out Settlement

***Capped Fee: \$3,570**

***Terms:**

1) Capped Fees assume that Simpluris will receive data in a Single Excel file with no substantial change in class size or response rate.

Total Possible Class Size:	375	Undeliverable Rate:	10%
Response Rate:	N/A	Call Rate:	N/A
Mailing Document Language:	English/Spanish	Re-distribution:	No
Reminder Postcard / Letter:	No	State(s):	Single
Unclaimed Funds	Escheat	Tax Years	One

Case Setup

Data Compilation - Develop Case Specific Response Tracking - Error Reports

Category	Unit Value	# of Units	Total
Project Manager - Case Setup, Website posting	\$125.00	0.5	\$62.50
translation	\$0.25	700	\$175.00
Database Manager - Initial Data Analysis	\$140.00	0.5	\$70.00
Total			\$245.00

Distribution

Setup a Disbursement Account

Print & Mail Checks to Class Members - W2's / 1099's - File Reports with Appropriate Federal & State Taxing Authorities

Account Management & Reconciliation

Category	Unit Value	# of Units	Total
Disbursement Data Preparation	\$140.00	1	\$140.00
Disbursement Manager - Data Validation	\$75.00	1	\$75.00
Mailing Supervisor	\$50.00	1	\$50.00
Print & Mail Checks	\$2.00	375	\$750.00
Postage	\$0.58	375	\$217.50
Process Returned Checks	\$0.50	4	\$1.88
Skip Trace Search Undeliverable Checks	\$5.00	4	\$18.75
Remail Checks	\$3.50	4	\$13.13
Remail Checks Postage	\$0.58	4	\$2.18
QSF Account Reconciliation	\$250.00	1	\$250.00
Individual Federal / State Tax Reporting	\$250.00	1	\$250.00
QSF Reporting / Declaration	\$300.00	1	\$300.00
QSF Annual Tax Preparation Fee(2022)	\$750.00	1	\$750.00
Unclaimed funds to State (manage)	\$150.00	1	\$150.00
Reissuing Checks/Mailing	\$2.50	1	\$2.50
Reissuing Checks Postage	\$0.58	1	\$0.58
Disbursement Manager	\$125.00	1	\$125.00
Total			\$3,520.58



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Case Wrap Up

Send Final Reports to Counsel

Category	Unit Value	# of Units	Total
Data Manager: Final Reporting	\$125.00	0	\$0.00
Total			\$0.00

Postage \$220.26 Total Case Costs \$3,765.58