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Attorneys for Plaintiff Nancy Garcia
individually and on behalf of all others
similarly situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

LOS ANGELES COUNTY – COMPLEX COURT

NANCY GARCIA, individually and on behalf
of all others similarly situated,

Plaintiff,

vs.

COMMON AREA MAINTENANCE
SERVICES, INC. dba CAM SERVICES,
INC., CAM PROPERTY SERVICES, INC., a
California Corporation, DAVID HERRERA,
an individual, and DOES 1 through 20,
inclusive;

Defendants.

CASE NO. 20STCV19361

**DECLARATION OF IRVIN GARCIA
ON BEHALF OF CPT GROUP, INC.
REGARDING SETTLEMENT
ADMINISTRATION AND NOTICE**

Date: March 22, 2024

Time: 9:00 a.m.

Dept: 6

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I, Irvin Garcia, declare as follows:

1. I am a Case Manager for CPT Group, Inc. (“CPT”). I have personal knowledge of the facts stated herein, and, if called upon to testify, I could and would testify competently to such facts.

2. CPT has extensive experience in providing notice of class actions and administering class action settlements. In the past 30-plus years, we have provided notification and/or claims administration services in thousands of class action cases. Pursuant to the Stipulation of Class Action Settlement for this matter, CPT is responsible for translating, printing and mailing the *Notice of Class Action Settlement* (herein referred to as “Notice Packet”), using the National Change of Address (NCOA) search and Skip Trace to obtain updated and forwarding addresses, resolving any disputes received from Class Members, drafting and mailing the settlement payments to participating Class Members, issuing IRS W2 and 1099 forms accordingly, and performing such other tasks as set forth in the Stipulation of Class Action Settlement or as the Parties mutually agree or that the Court orders.

3. CPT received the Court-approved text for the Notice Packet from Counsel on September 5, 2023.

4. CPT finalized a 6-page Notice Packet into English and Spanish, respectively. CPT received written approval from all parties and a sufficient number were printed to mail to all Class Members. A true and correct copy of the Notice Packet is attached hereto as Exhibit A.

5. On January 4, 2024, CPT received a class data file from Defense Counsel that contained names, last known mailing addresses, Social Security numbers, employment dates and work weeks during the class period. The finalized class list contained 186 Class Members.

6. On January 15, 2024, CPT conducted a National Change of Address (NCOA) search in an attempt to update the class list of addresses as accurately as possible, for all Settlement Class Members. A search of this database provides updated addresses for any individual who moved in the previous four years and notified the U.S. Postal Service of a change of address. As a result of the NCOA, CPT was able to locate 18 updated addresses.

1 7. The Notice Packets were enclosed in envelopes with the names and known
2 addresses printed on them. On January 16, 2024, the Notice Packets were mailed via U.S. first
3 class mail to all Class Members.

4 8. As of the date of this declaration, 14 Notice Packets have been returned to our
5 office by the Post Office. CPT performed a Skip Trace on all returned mail with no forwarding
6 addresses in an effort to locate a better address using Accurint, one of the most comprehensive
7 address databases available. It utilizes hundreds of different databases supplied by credit
8 reporting agencies, public records and a variety of other national databases.

9 9. As a result of either skip trace, forwarding address provided from the Post Office,
10 or request from counsel or the Class Member themselves, a total of 13 Notice Packets have been
11 re-mailed to date. As of this date, there is ultimately 1 Notice Packet undeliverable with no
12 forwarding address, where no new address could be found through skip trace.

13 10. Class Members have until March 22, 2024, to submit objections, disputes and/or
14 requests for exclusion.

15 11. As of the date of this declaration, CPT has not received any written objections to
16 the settlement from Class Members.

17 12. As of the date of this declaration, CPT has not received any disputes from Class
18 Members regarding their workweeks.

19 13. As of the date of this declaration, CPT has not received any written requests for
20 exclusion.

21 14. As of the date of this declaration, CPT will report that a total of 186 participating
22 Class Members are part of this class action settlement, representing a 100% participation rate. As
23 of the date of this declaration, the total amount to be distributed to participating Class Members
24 is calculated to be \$197,437.50. The lowest payment to a participating Class Member is \$12.52.
25 The average payment to each participating Class Member is estimated at \$1,061.49. The highest
26 payment to a participating Class Member is estimated at \$4,510.96.

27 15. CPT will charge a total of \$9,750.00 in costs associated with the administration of
28 the Settlement. This includes all costs incurred to date, as well as estimated costs involved in
completing the Settlement.

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2 I declare under penalty of perjury under the laws of the State of California that the
3 foregoing is true and correct. Executed this 26th of February 2024, at Irvine, California.
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7 Irvin Garcia
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