

Jonathan M. Lebe (SBN 284605)
jon@lebelaw.com
Annaliz Loera (SBN 334129)
annaliz@lebelaw.com
LEBE LAW, APLC
777 S. Alameda Street, Second Floor
Los Angeles, CA 90021
Telephone: (213) 358-7046

Attorneys for Plaintiff Melinda James,
Individually and on behalf of all others similarly situated

Christine D. Baran (State Bar No. 158603)
Cbaran@fisherphillips.com
Ashton M. Riley (State Bar No. 310528)
Ariley@fisherphillips.com
Fisher & Phillips LLP
2050 Main Street, Suite 1000
Irvine, CA 92614

Attorneys for Defendant Coolsys Commercial & Industrial Solutions Inc.
Source Refrigeration & HVAC, Inc.

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ORANGE

Melinda James, individually and on behalf of all
others similarly situated,

Plaintiff,

Vs.

Coolsys Commercial & Industrial Solutions,
Inc.; Source Refrigeration & HVAC, Inc.; and
Does 1-10, Inclusive,

Defendants.

Case No. 30-2020-01163014-CU-OE-CXC

Assigned to the Honorable Peter Wilson

**SUPPLEMENTAL DECLARATION OF
LAURA SINGH REGARDING NOTICE
AND SETTLEMENT
ADMINISTRATION**

Hearing

Date: April 21, 2022
Time: 2:00 p.m.
Dept.: CX-102

1
2 I, Laura Singh, declare as follows:

3 1. I am employed by CPT Group, Inc., the Court-approved class action Settlement
4 Administrator for *Melinda James v. Coolsys Commercial & Industrial Solutions, Inc., et al.*, as a
5 Case Manager. I have personal knowledge of the facts set forth in this Declaration, and if called
6 as a witness, I could and would testify competently thereto.

7 2. I submit this supplemental declaration to update my prior declaration, dated March
8 21, 2022.

9 3. As of the date of this declaration, 14 Notices have been returned to our office by
10 the U.S. Postal Service, none of which were provided a new address by the Post Office. CPT
11 performed a skip trace to locate a better address using Accurint, one of the most comprehensive
12 address databases available. It utilizes hundreds of different databases supplied by credit
13 reporting agencies, public records and a variety of other national databases.

14 4. As a result of skip trace effort or re-mail request from Counsel or the Class
15 Members themselves, a total of 12 Notices have been re-mailed to date. As of the date of this
16 declaration, Settlement Administrator reports 3 undeliverable Notices.

17 5. As of the date of this declaration, CPT has received 7 requests for exclusion from
18 Julie S. Costin, Jaclyn Lee Fernandez, Susan Sandoval, Brittani Graves, Aurora Torres, Zehra
19 Ceizar and Lisa Andersen. Two of these requests for exclusion were late. Lisa Anderson was
20 initially flagged as late because her request for exclusion was postmarked March 14, 2022, and
21 CPT received it on March 16, 2022. It was also deficient due to a missing last 4 digits of their
22 social security number. CPT contacted this individual to confirm the last 4 digits of their social
23 security number. However, this individual indicated that they were a prior victim of fraud and
24 did not wish to provide it. As a one-time exception, CPT unflagged the deficiency though the
25 request for exclusion was still flagged as late. Zehra Ceizar request for exclusion was postmarked
26 April 7, 2022, and CPT received the request on April 11, 2022. CPT inquired with Counsel if they
27 would like to accept these late requests for exclusion. After review of counsel, it was determined
28

1 that the requests for exclusion was not accepted. Therefore, both individuals will remain class
2 members and CPT reports a total of 5 valid requests for exclusion.

3 6. As of the date of this declaration, CPT has not received any objections.

4 7. As of the date of this declaration, CPT has not received any disputes regarding
5 workweeks.

6 8. As of the date of this declaration, CPT reports a total of 410 Participating Class
7 Members, representing 98.79% of the Settlement Class.

8 9. The entire Net Settlement Amount was used to calculate the estimated amount for
9 each Class Member:

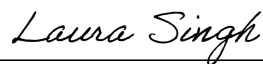
Total Settlement Amount	\$527,500.00
Less Class Counsel Fees	\$175,833.33
Less Class Counsel Cost	\$15,000.00
Less Enhancement Award	\$5,000
Less LWDA Payment	\$18,750.00
<u>Less Settlement Administration Costs</u>	<u>\$13,500.00</u>
Net Settlement Amount	\$299,416.67

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16 10. Based on estimated settlement calculations at this time, the average gross payment
17 to each Class Member is \$721.49 and the highest is \$1,331.22 and the minimum is \$5.66.

18 11. Plaintiff Melinda James' settlement share is \$73.64 and PAGA share is \$3.22.

19 12. CPT will charge a total of \$13,500.00 in costs associated with the administration
20 of the settlement. This includes all costs incurred to date, as well as estimated costs involved in
21 completing the settlement.

22 I declare under penalty of perjury under the laws of the State of California that the
23 foregoing is true and correct, and that this declaration is executed this 12th day of April 2022, at
24 Irvine, California.

25 
26 Laura Singh