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3 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
4 **COUNTY OF SAN MATEO**

5 **DON SARUBBI, as an individual and on**
6 **behalf of all others similarly situated,**

7 **Plaintiffs,**

8 **vs.**

9 **TECH MAHINDRA (AMERICAS) INC., a**
10 **New Jersey corporation; TECH MAHINDRA**
11 **NETWORK SERVICES INTERNATIONAL,**
12 **INC., a Delaware corporation, TECH**
13 **MAHINDRA TECHNOLOGIES, INC., a**
14 **Delaware corporation; TECH MAHINDRA**
15 **NETWORK SERVICES, a business**
16 **organization, form unknown, and DOES 50**
17 **inclusive,**

18 **Defendants.**

Case No.: 20-CIV-03616

DECLARATION OF CHRISTOPHER
LONGLEY ON SETTLEMENT
ADMINISTRATION QUALIFICATIONS
AND THE COST OF SERVICES

19 I, Christopher Longley, declare as follows:

20 1. I am the co-founder and Chief Executive Officer for Atticus Administration, LLC
21 (“Atticus”). My business address is 1250 Northland Drive Suite 240, Mendota Heights, Minnesota
22 55120. My telephone number is (612) 315-9007. I am over twenty-one years of age and am
23 authorized to make this declaration on behalf of Atticus and myself. I have personal knowledge of
24 the matters set forth herein and, if called upon to do so, could and would competently testify thereto
25 under oath.

26 2. In 2016, I, along with other experienced legal, financial, digital marketing
27 professionals and brand managers, founded Atticus Administration LLC in order to provide
28 innovative and cost-effective notice campaigns and claims administration services to the class action
legal sector.

DECLARATION OF CHRISTOPHER LONGLEY ON SETTLEMENT ADMINISTRATION QUALIFICATIONS AND THE
COST OF SERVICES

1 3. Prior to founding Atticus, I served as the president of Dahl Administration, LLC, a
2 nationally recognized claims administration company, where I oversaw over three hundred (300)
3 settlements, including some of the highest profile cases over the last few years, including, for
4 example, In Re Motor Fuel (Hot Fuel) and the Target Data Breach, Financial Institutions class action
5 settlement.

6 4. Atticus provides services in class and collective action settlements involving, inter
7 alia, antitrust, consumer fraud, financial services, insurance, ADA, civil rights, and employment
8 matters, including wage and hour, PAGA Claims and FLSA collective actions.

9 5. Atticus's core competencies include pre-certification mailings, claims administration
10 including the processing of claim forms, claim validation and anti-fraud detection, data preparation
11 and data management, accounting services and tax reporting, qualified settlement fund management
12 and escrow services, and distribution of funds.

13 6. Since its inception, Atticus has provided administrative services in over 600 class
14 action settlements and has disbursed approximately \$614,000,000 (See **Exhibit A -Firm CV**).
15 Among the founders and team members of Atticus, collectively we have administered over 3,300
16 settlements and have disbursed over \$3,000,000,000 in settlement funds. Of that amount, over 600
17 of the settlements administered were wage and hour or FLSA or PAGA matters.

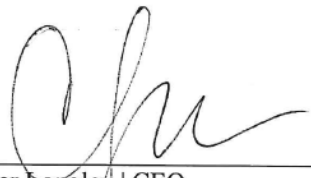
18 7. In accordance with the terms of the Settlement Agreement in this case, Atticus will,
19 upon preliminary approval, mail the Notice of Settlement and Settlement Check to respective
20 Aggrieved Employees to their Last Known Address via pre-paid postage first class mail through the
21 United States Postal Service ("USPS"). Prior to mailing the Notice of Settlement and Settlement
22 Checks, Atticus will verify the Last Known Address using the National Change of Address (NCOA)
23 database maintained by the USPS, and if an Updated Address is found, that Updated Address shall
24 be used in lieu of the Last Known Address and be treated as the new Last Known Address for
25 purposes of this mailing and subsequent mailings. Any Notices of Settlement that are returned will
26 be processed, skip-traced and re-mailed as outlined in the Settlement Agreement, three business days
27 (3) after Notice is returned for address correction.

1 8. Atticus uses a variety of tools for skip- tracing purposes in order to find addresses that
2 have no forwarding location. These tools include Experian, IDI, and other similar professional
3 resources to locate Aggrieved Employees. In some instances, Atticus will also hire professional skip
4 tracing firms to locate missing Class Members, Party Plaintiffs or Aggrieved Employees for
5 Noticing purposes and to subsequently distribute funds to Class Members. Until Atticus reviews the
6 data file in the above captioned case, we do not yet know what the best course of action will be to
7 contact those Class Members who do not have forwarding address information on file with the
8 USPS.

9 9. It is anticipated the costs to administer this PAGA settlement to seven (7) Aggrieved
10 Employees will cost no more than \$450, which includes the costs for mailing and printing of
11 Settlement Checks, and any follow up work with the appropriate government entities for tax and
12 unemployment reporting.

13
14 **I declare under penalty of perjury under the laws of the state of California that the**
15 **foregoing is true and correct and executed on 10th day of January 2022 in Mendota Heights,**
16 **Minnesota.**

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Christopher Longley | CEO
Atticus Administration, LLC

EXHIBIT A



Founded in August 2016, Atticus has administered 617 settlements and has distributed more than \$614 million in award payments. Collectively, the Atticus team has over 100 years of industry experience, and has managed over 3,000 settlements, and has distributed more than \$3 billion. Below is a partial listing of our cases, and the cases that our team has managed during their careers.

Partial listing of Atticus' current cases and References

- Birbower v Quorn Foods Inc. -Consumer Food Labeling
- Guillen v AAA Limo-Consumer Finance
- Zamdio v Underground Rocket-CAFA
- Sears Trust
- Noll v Oxford-FLSA
- Kendall v Cubesmart-Consumer Finance
- Moskowitz v Atlanta Hawks-FACTA
- Santos v River Credit Works
- Tirado v Deluxe Auto Sales-Consumer Finance
- Chung v Alliance One-FDCPA
- Raff v Safevia-Consumer Finance
- Diaz v Azona-Wage & Hour
- Rosinbaum v Flowers Foods
- Marroquin v Premium Packaging-FLSA
- Hernandez v So Molo CO-FLSA
- The Bakery v Kenneth Pritt et al-Mass Tort
- Ramirez v Milton Roy-Wage & Hour
- Meyers v bebe Stores-TCPA
- Isabel Marquez v Tanimura & Antle-FLSA
- Camacho v Southwest Harvesting-FLSA
- Velasquez v SMD-Wage & Hour
- Right at Home Settlement-Consumer
- Park v United Collections-FDCPA
- McGlenn v Sprint-FLSA
- Redon v La Esperanza Farms-FLSA
- Home Advisor Settlement
- Morales v OPARC-Wage & Hour
- Loness v US Legal Services-Consumer Fraud
- In Re Managed Care Solutions-Healthcare Anti-Trust
- Kruzell v Suncoast Credit Union-FCRA
- Comofort v Fernandez Brothers-Wage & Hour
- Harris v General Motors-FCRA
- Jillal v Diesel Services-FLSA



- Padilla v Valadeo-Wage & Hour
- Coyle v Flowers-FLSA
- Espinoza v Alicia Accoyo-Wage & Hour
- Santiago v Northland Group-Insurance
- Viesse v Tacoma Screw-FACTA
- Matthews v Red Hill Country Club
- Tharpe v Sprint Corp
- USI Settlement
- Benefield v Springco Metal Coatings
- Watkins v Pressler Pressler
- Thomas v Goodman Manufacturing
- Bruce v Del Monte Foods
- Best v Twins Towing Inc
- Ahmed v Beverly Hills Rehabilitation Services
- Cook v Window Nation
- Costco-46 State FLSA
- Meyers v Mathis Brothers
- Vela-Cruz v AG Transport
- Ayala et al v Olsen Brothers Ranches
- Big Saver Foods-FACTA Settlement
- Huynh v Parker -Hannifin Corp
- Soto v Vander Tuig Dairy
- Vinnitsky v LA Overnight
- Molando v Dayton Superior
- Party City-FACTA Settlement
- Wesco Aircraft Hardware Corporation Settlement
- Russell v KeHE Distributors
- Exact Staffing Settlement
- Allard v MEd Impact
- Escalata v La Tapatia Mexican Market
- Massarani v Waterman
- Martinez v Providence Farms
- Milo's Chicken Jerky Settlement (Mawbry v Milo's Kitchen)
- Wall v Hewlett Packard Industries
- Daisy Castro v Caterpillar Logistics
- Schucker v Flowers Foods International
- Vega v BAR Dairy
- Xcel Health Settlement
- McCurley v Derst Bakery
- Rosenbloom v Jets Pizza
- Marquez v D 'Arrigo Brothers
- Johnson v Thomson Reuters
- Caudle v Sprint Cellular
- Ciaz v ND Travel Nurses
- Sparks v Service Finance Company
- Smentek v Sheriff of Cook County



- Ibanez v OC Burger Boys
- De La Rosa v Coca Cola
- Porreca et al v Flowers Baking Company
- Event Merchandising Settlement
- Lopez c George Amaral Ranches
- JKM Trading Settlement
- Crema v New Jersey National Golf Club
- Diaz v Arcona Farms
- Flowers Texas Settlement
- Miller v Flowers Foods of North Dakota
- Flowers Global Settlement
- Ali v Sutter Valley Medical
- Douillard v Sprint Cellular
- Patterson v Volkswagen
- Johnson v Oxnard Automotive Exchange
- Goh v NCR Corporation
- Blackburn v APTIM Services
- SIP ERISA Settlement
- Rench v HMI-Wage & Hour
- Matise v Dun & Bradstreet-Wage & Hour
- Lazy Boy Furniture Galleries Settlement-Wage & Hour
- Gruma Bakeries FLSA Settlement
- Flowers Global FLSA Settlement
- Hud son v Valley Hope Hospital-Data Breach
- Bennett v Alorcia-PAGA
- Shachno v Pendry-PAGA/ Wage and Hour
- Matise v Dun & Bradstreet
- Gray v HCI-BIPA
- Jimenez v The Growers Company
- Supplemental Income Trust Settlement-ERISA
- Reyers v Unified Grocers
- Lyons v Green
- Manni v Lazy-Boy
- Carter v Bed Bath & Beyond
- Wall v Ashbritt
- Schulte-BIPA Settlement
- Carrillo v Mabry Management-PAGA/ Wage & Hour
- Fisher v Behavioral Health Services-PAGA/ Wage & Hour
- OFCCP v Sprint
- Boehm v BMW North America
- Carter v City of Ferguson-Civil Rights
- Gould v Farmers Insurance-TCPA
- Juarez v Laguna Farms-PAGA
- Power v Sandbox Logistics
- Andrews v Prestige Care-PAGA
- Foster v Advantage Sales



- Deak v In and Out Burger-PAGA

Partial listing of cases the Atticus Team has managed

- Tardiff v. Knox Count
- Nilsen v. York Count
- Tyler v. Suffolk Count
- Braun v. Walmart
- Lundeen v Canadian Pacific Railroad
- Frank v. Gold'n Plump Poultry
- Mass tort Guidant defibrillator
- Cazenave v. Sheriff Charles C. Foti
- Brecher v. St. Croix County
- McCain v. Bloomberg
- Carnegie v Household
- High Sulfur Gasoline Product Liability Shell Oil
- Merrill Lynch Securities Litigation
- McKesson HBOC Securities Litigation
- Raytheon Co. Securities Litigation
- Bokusky v. Edina Realty
- Applied Card Bank Credit Card Litigation
- Sun Country Employee Litigation
- Dupont Chemical Pollution Litigation
- Haight v Bluestem Brands, Inc. -TCPA
- Dugan v TGIF-Wage and Hour/FLSA
- Dunkel v Warrior Energy-Energy-Wage & Hour
- Shelby v Miller Investment Group-Consumer Finance
- Salas v Watkins Manufacturing-FLSA
- Dull v IPS-Energy Sector Wage & Hour
- Wallach v FFG-TCPA
- Bourgeoisie v City of Baltimore-Consumer Fees
- Brown v Alley-FLSA
- Turner v ACD-Wage & Hour
- Villa v San Francisco 49'ers-Consumer Fees
- Thomas v Solvay
- Reid v Unilever-Mass Tort
- Zeller v PDC Corporation-FLSA
- Murr v Capital One-Consumer Fraud
- Redman v City of Chicago- Consumer Fees
- Ernst v Sterling-Dish Case-Consumer Fraud
- Ott-Publix-FLSA
- Ellsworth v US Bank-Consumer Finance
- Vidra v Midland Financial-Consumer Finance
- Vu v Performance Recovery



- Freeman v Berkeley Packaging-FLSA
- Martin v JTH-TCPA
- Walker v Core Power Yoga-Wage & Hour
- Froberg v Cumberland Packaging-Stevia in the Raw Settlement-False Labeling
- Debarsekin v L2T-FLSA & Wage and Hour
- Gay v Tom's of Maine-False Labeling
- Templeton Rye -False Labeling
- Belardes v Farm Fresh to You-FLSA
- Tin Cup Settlement-False Labeling
- Johnson v ScanSAT-Medical Billing Fees
- Garcia v EJ Amusement-FLSA and Wage & Hour
- Doran v Forever Grand Vacations-Consumer Fraud- Time Share
- Velasco v Chrysler Corp-Recall
- Covell v Sleep Train-Wage & Hour
- Torres v Kwon Yet Lung-FACTA
- Redman v IMAX-FACTA
- Target Data Breach-Financial Institutions
- In Re Motor Fuel- Hot Fuel Case- Consumer Fraud
- Haight v Bluestem-TCPA
- Martin v JTH-TCPA

Project Team

Chris Longley, JD – CEO and Co-Founder – Former President of Dahl Administration, a nationally recognized Claims Administration Company. Licensed Attorney, admitted to practice Minnesota, 8th Circuit and United States Supreme Court. During Longley's Tenure at Dahl, he successfully managed some of the highest profile cases in the last few years, including *In Re Motor Fuel* (Hot Fuel), an all-digital notice campaign with over 160 mm class members in 36 states and US Territories, and the Target Data Breach- Financial Institutions Settlement.

Roger Bauser – Operations, Co-Founder of Analytics LLC – One of the first Claims Administration companies in the US (founded in 1977), Roger has over 40 years of experience in the industry and has worked on some of the largest cases, including McKesson Securities Litigation, a billion- dollar securities class action settlement. In addition to Roger's time at Analytics, he also worked with Rust Consulting.

Bryn Bridley – Director of Project Management – Bryn has over 15 years of Project Management experience within the industry, having worked with two large Settlement Administrators, Rust Consulting and Dahl Administration. Bryn's past claims administration work included the day-to-day activities of several high- profile consumer, employment and other types of cases. Bryn has extensive experience with CAFA Notices and Class Certification campaigns. Bryn is an honor's graduate of the University of Minnesota-Duluth and enjoys running and camping in her free time.



Joel Prest – Director of Technology – Joel has 15 years of experience with software development and project management. Joel has expertise in designing scalable solutions to allow end users to work more efficiently with easy to use applications. Joel's prior work history includes Human Resource Management, which allows him to understand system payroll needs, HIPPA, and tax requirements necessary for employment related cases.

Jim Hardy, CPA (Inactive) – Co-Founder and CFO – Prior to co-founding Atticus, Jim held finance leadership positions over a twenty-year period in a variety of industries (contract manufacturing - implantable medical devices, sheet-fed printing, and commodity trading) where the wide-range of responsibilities and challenges from these experiences has enabled him to develop a versatile set of finance, administrative and operations skills.

Mike Gelhar – Practice Director, Employment & Distributions – Mike brings over 15 years of payroll experience in employment law case experience. Along with his payroll knowledge, Mike is also bringing his work experience as he managed the processing and distribution of one of the nation's largest Labor and Employment administrators. These cases ranged from a few hundred claimants to over 700,000 claimants in all 50 states, including Puerto Rico.

Beth Paris – Project Coordinator-Beth joins the Atticus team as an experienced project coordinator and business analyst. Prior to joining Atticus, Beth worked for the judicial branch, specializing in Information Technology enhancements and efficiencies, for the day-to-day system functions within court operations. Beth is a certified Scrum Master with years of experience in team building, coaching and mentoring project teams. In her free time, she dedicates her attention to her animal rescue and enjoys the Minnesota summers at the family cabin.

Phil Hoelscher – Project Coordinator-Phil has been a Project Coordinator with the Atticus Administration since the beginning of 2019, after serving Atticus in the Customer Service Representative role for six months prior. Phil graduated from the University of MN, Duluth with a Bachelor of Fine Arts in Acting.