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VICENTE GONZALEZ

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO**

VICENTE GONZALEZ, as an individual and
on behalf of all others similarly situated,

Plaintiff,

vs.

NORCO PLASTICS, INC., a California
corporation; BEYOND STAFFING
SOLUTIONS, INC., a California corporation;
MOONSTONE PEO, INC., a Texas
corporation; and DOES 1 through 100,
inclusive,

Defendants.

Case No. CIVSB2026519

*[Assigned for all purposes to the Hon. David
Cohn, Dept. S-26]*

**DECLARATION OF ERIC SPRINGER OF
SIMPLURIS, INC. IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: June 22, 2023
Time: 10:00 a.m.
Dept.: S-26

Action Filed: August 7, 2020
Trial Date: None

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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
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
tration of class and collective action matters.

4. Simpluris has never had any financial interests in nor affiliation with the parties or in the *Vicente Gonzalez v. Norco Plastics, 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 other issues. Simpluris specializes in pre-settlement consultation, data management, legal research, call center support, claims processing and tax reporting.

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

7. Simpluris is committed to the security of not only our data and information but the data and information as well. We have not experienced any security breaches in our history. A true and correct copy of our SOC 2 Compliance demonstrating our commitment to security is attached to our bid on **Exhibit A**. Additionally, Simpluris maintains 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 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

**Class Action Settlement Administration**

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

Estimate #: 14540
Estimate Date: 3/8/2022

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

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

Defense Attorney
Attorney/Client:
Firm:

Case Name: Vincente Gonzalez/ Norco Plastics: Settlement

Capped Fee* **\$6,800**

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.
- 2) Case setup and Notification fees to be invoiced prior to mailing.

Total Possible Class Size:	300	Undeliverable Rate:	10%
Response Rate:	1%	Call Rate:	5%
Mailing Document Language:	English/Spanish	Redistribution:	No
Reminder Post Card	No	Tax Withholdings State:	CA
Unclaimed Funds	State	Residence State(s):	Single

Case Setup**Data Compilation - Develop Case Specific Response Tracking - Error Reports**

Category	Unit Value	# of Units	Total
Project Manager - Case Setup, Online Posting	\$125.00	4	\$500.00
Court Certified Language Translation	\$0.25	2,100	\$525.00
Database Manager - Initial Data Analysis	\$140.00	3	\$420.00
Total			\$1,445.00

Notification**Mailing Notice Pack: 7 pg Notice - Double Sided; English/Spanish**

Category	Unit Value	# of Units	Total
Mailing Notice Pack	\$1.00	300	\$300.00
Postage	\$0.58	300	\$174.00
NCOA/CASS/LACS	\$0.05	300	\$15.00
Undeliverable Processing	\$0.50	30	\$15.00
Skip Trace RUM	\$2.00	30	\$60.00
Remail	\$1.50	30	\$45.00
Postage	\$0.58	30	\$17.40
Clerical	\$50.00	1	\$50.00
Total			\$676.40



Class Action Settlement Administration

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800-779-2104 www.simpluris.com

Administration

Process Mail, Opt-Outs or Objections

Category	Unit Value	# of Units	Total
Database Manager	\$125.00	2	\$250.00
Resolving Mismatched TINs	\$75.00	1	\$75.00
Dispute/Deficiencies-Send One Cure Letter	\$2.50	2	\$5.25
Opt Out Processing	\$2.50	2	\$5.25
Data Entry	\$50.00	1	\$50.00
Claims Administrator	\$75.00	1	\$75.00
Project Manager	\$125.00	1	\$125.00
Weekly Reporting to Counsel	WAIVED	12 Wks of Reporting	\$0.00
Total			\$585.50

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	3	\$420.00
CyPres to State	\$500.00	1	\$500.00
Disbursement Manager - Data Validation	\$75.00	1	\$75.00
Setup Banking Account/QSF	\$75.00	1	\$75.00
Print & Mail-Check	\$2.50	300	\$750.00
Postage	\$0.58	300	\$174.00
Process Returned Checks	\$0.58	3	\$1.74
Skip Trace Search Undeliverable Checks	\$5.00	3	\$15.00
Remail Checks	\$3.00	3	\$9.00
Postage	\$0.58	3	\$1.74
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	\$750.00	1	\$750.00
Reissuing Checks/Mailing	\$5.00	5	\$22.50
Postage	\$0.58	5	\$2.61
Escheat Management-State 384	\$125.00	1	\$125.00
Disbursement Manager	\$125.00	2	\$250.00
Total			\$3,971.59



Class Action Settlement Administration

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Case Wrap Up

Send Final Reports to Counsel

Category	Unit Value	# of Units	Total
Data Manager-Final Reporting	\$125.00	1	\$125.00
Total			\$125.00

Postage \$369.75 Total Case Costs \$6,803.49