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Attorneys for Plaintiffs and the Proposed Class

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN MATEO

DAMONT RICHARDSON, an
individual, on behalf of himself and others
similarly situated, ,

Plaintiff (s),

v.

PEGASUS AVIATION SERVICES,
LLC; and DOES 1 through 50, inclusive,

Defendants.

Case No. 21-CIV-00292

**DECLARATION OF LLUVIA ISLAS OF
ILYM GROUP, INC., RE:
ADMINISTRATION FEES**

Judge: Hon. Danny Y. Chou

1 I, Lluvia Islas, declare as follows:

2 1. I am a resident of the United States of America and am over the age of 21. I am a
3 Case Manager for ILYM Group, Inc., (herein after referred to as “ILYM”), a professional class
4 action services provider. I am preparing this declaration at the request of Plaintiff’s Counsel. I have
5 personal knowledge of the facts herein, and, if called upon to testify, I could and would testify
6 competently to such facts.

7 2. ILYM Group has extensive experience in administering Class Action Settlements,
8 including direct mail services, database management, claims processing and settlement fund
9 distribution services for Class Actions ranging in size from 26 to 4.5 million Settlement Class
10 Members.

11 3. ILYM Group was engaged by the Parties’ Counsel and subsequently approved and
12 appointed by the Court to provide notification services and claims administration, pursuant to the
13 terms of the Settlement, in the above referenced Action.

14 4. In order to manage the project, ILYM Group incurred costs on a transactional and
15 hourly rate, depending on the service provided.

16 5. Case startup costs involved setup and formatting of the class list, in addition to
17 uploading the list to our database. The cost incurred for those services was \$800.00.

18 6. Project management time was required to oversee the project. The services included
19 general oversight, form processing, address location via the National Change of Address database,
20 Spanish translation of the notice materials, setting up and maintaining ILYM Group static website
21 and toll-free phone support. The cost incurred for those services was \$2,410.00.

22 7. On August 24, 2022, the Notice Packet was mailed, via U.S First Class Mail, to all
23 267 individuals contained in the Class List. The cost of mailing, remailing undeliverable notices,
24 locating addresses via trace and storage of documents was \$879.40.

25 8. After approval of the settlement, ILYM Group will be required to mail payments to
26 eligible Class Members. This includes setup of the appropriate tax ID’s, calculation of awards,
27 reconciliation of the bank account, mailing of payments, address location of undeliverable
28

1 payments and filing taxes with the appropriate tax authorities. The expected cost incurred is
2 \$2,975.60.

3 9. At the completion of the project, ILYM Group will prepare a final reporting at an
4 expected cost of \$935.00.

5 10. The total cost of administration will not exceed \$8,000.00.
6

7 I declare under penalty of perjury under the laws of the State of California and the United States
8 that the foregoing is true and correct to the best of my knowledge and that this Declaration was
9 executed this 28th day of October 2022, at Tustin, California.
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13 _____
14 LLUVIA ISLAS
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(PROOF OF SERVICE)
[CCP 1013(a)(3)]
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 16133 Ventura Boulevard, Suite 1200, Encino, California 91436.

On November 4, 2022, I served all interested parties in this action the following documents described as: **DECLARATION OF LLUVIA ISLAS OF ILYM GROUP, INC., RE: ADMINISTRATION FEES** by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Heather Hearne hdh@kullmanlaw.com The Kullman Firm, PLC 4605 Bluebonnet Blvd., Suite A Baton Rouge, LA 70809	Emil Davtyan emil@davtyanlaw.com Davtyan Law Firm, Inc. 880 E. Broadway Glendale, CA 91205 John P. Briscoe jbriscoe@mayallaw.com Mayall Hurley P.C. 2453 Grand Canal Boulevard Stockton, California 95207-8253
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[XX] BY ELECTRONIC SERVICE: I caused a true and correct copy thereof to be electronically filed using the Labor and Workforce Development Agency Electronic Filing ("EF") System (<https://dir.tfaforms.net/315>) and service was completed by electronic means by transmittal of the documents referenced herein on the EF System.

[XX] BY ELECTRONIC MAIL TRANSMISSION: I caused the document to be send to the persons at the e-mail address(es) listed on the attached service list. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful. A pdf copy of which was sent via email to the above email address(es).

[XX] (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on November 4, 2022, at Woodland Hills, California.



Michelle A. Tanzer