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Attorneys for Plaintiff
JAIME BARAJAS

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

JAIME BARAJAS, as an individual and on
behalf of all others similarly situated,

Plaintiff,

vs.

SCHUMACHER CARGO LOGISTICS, INC.,
a California corporation; and DOES 1 through
100, inclusive,

Defendants.

Case No. 21STCV04851

*[Assigned for All Purposes to Hon. Amy D.
Hogue, SSC-7]*

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

Date: August 11, 2022
Time: 10:00 a.m.
Dept.: SSC-7

Action Filed: February 5, 2021
Trial Date: None Set

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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 testify, 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 administration of class and collective action matters.

4. Simpluris has never had any financial interests in nor affiliation with the parties or counsel in the *Jaime Barajas v. Schumacher Cargo Logistics, 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 consumer issues. Simpluris specializes in pre-settlement consultation, data management, legal notification, call center support, claims processing and tax reporting.

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

7. Simpluris is committed to the security of not only our data and information but the Parties' data and information as well. We have not experienced any security breaches in our company 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 insurance 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 for this case.

1 10. Simpluris will use information from counsel for Defendant to mail the Notice
2 Packets (which is comprised of the Notice of Pendency of Class Action and Settlement and Notice
3 of Settlement Award) and settlement checks, e.g., spreadsheets of the settlement class members'
4 names, last known address, last known telephone number, and dates of employment ("Class
5 List").

6 11. Simpluris will process and update the mailing addresses contained in the Class List
7 utilizing the National Change of Address Database ("NCOA") maintained by the U.S. Postal
8 Service. The NCOA contains requested changes of address filed with the U.S. Postal Service. In
9 the event that any individual filed a U.S. Postal Service change of address request, Simpluris will
10 update the mailing address listed in the Class List and Information with the mailing address
11 obtained through the NCOA and use the updated address in connection with the mailing of the
12 Notice Packets. Upon approval from the Court, Simpluris will mail them via First Class mail,
13 postage prepaid. A mock-up of the front of the envelope transmitting the Notice Packet, which
14 will be mailed in both English and Spanish and states "Please open and read. Important
15 information enclosed which affects your rights regarding your employment at Schumacher Cargo
16 Logistics, Inc." is attached hereto as **Exhibit B**.

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18 12. Any Notice Packets returned to Simpluris as non-delivered shall be re-mailed to
19 the forwarding address affixed thereto.

20 13. In addition to the above-referenced duties, Simpluris is committed to performing
21 any other tasks necessary to carry out its responsibilities as set forth in the Settlement, as the
22 Parties mutually agree, or as the Court orders Simpluris to perform.

23 14. A mock-up of the front of the envelope transmitting the checks, which will be
24 mailed in both English and Spanish and states "Open immediately. Settlement payment is
25 enclosed" is attached hereto as **Exhibit C**.

26 15. This Administration project has a fixed rate of \$3,500.00, which includes costs
27 associated with mailing the Notice Packets in both English and Spanish, creating a static website,
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1 and maintain a Qualified Settlement Fund for the payment plan. A detailed breakdown of
2 Simpluris' cost is attached hereto as **Exhibit D**.

3 **PAYMENT PLAN**

4 16. Simpluris is aware that the Gross Settlement Amount of \$500,000.00 will be
5 deposited in two (2) installments. The first installment of \$250,000.00 is due within 10 calendar
6 days after the Effective Date. The second installment of \$250,000.00 is due no later than six
7 months after the first payment is made.

8 17. The employer-side taxes that are to be paid by Defendant separate and in addition
9 to the Gross Settlement Amount is due no later than 5 calendar days after the second and final
10 payment is done by Defendant.

11 18. Simpluris will hold all portions of the Gross Settlement Amount in an interest-
12 bearing account until the time for disbursement.

13 19. Simpluris understands that the first \$3,500.00 paid by Defendant will be
14 earmarked to pay for the Settlement Administration costs.

15 I declare under penalty of perjury under the laws of the United States and state of
16 California that the foregoing is true and correct.

17 Executed on this 30th day of March, 2022 at Melbourne, Florida.

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20 ERIC SPRINGER
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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

Envelope Front

Barajas v. Schumacher Cargo Logistics
c/o Simpluris, Inc.
P.O. Box 26170
Santa Ana, CA 92799-9834

PRESORTED
FIRST-CLASS MAIL
US POSTAGE
PAID
SIMPLURIS INC

Please open and read. Important information enclosed which affects your rights regarding your employment at Schumacher Cargo Logistics, Inc.
Por favor abra y lea. Se adjunta información importante que afecta sus derechos con respecto a su empleo en Schumacher Cargo Logistics, Inc.

Name
Address
City, St Zip

Envelope Back

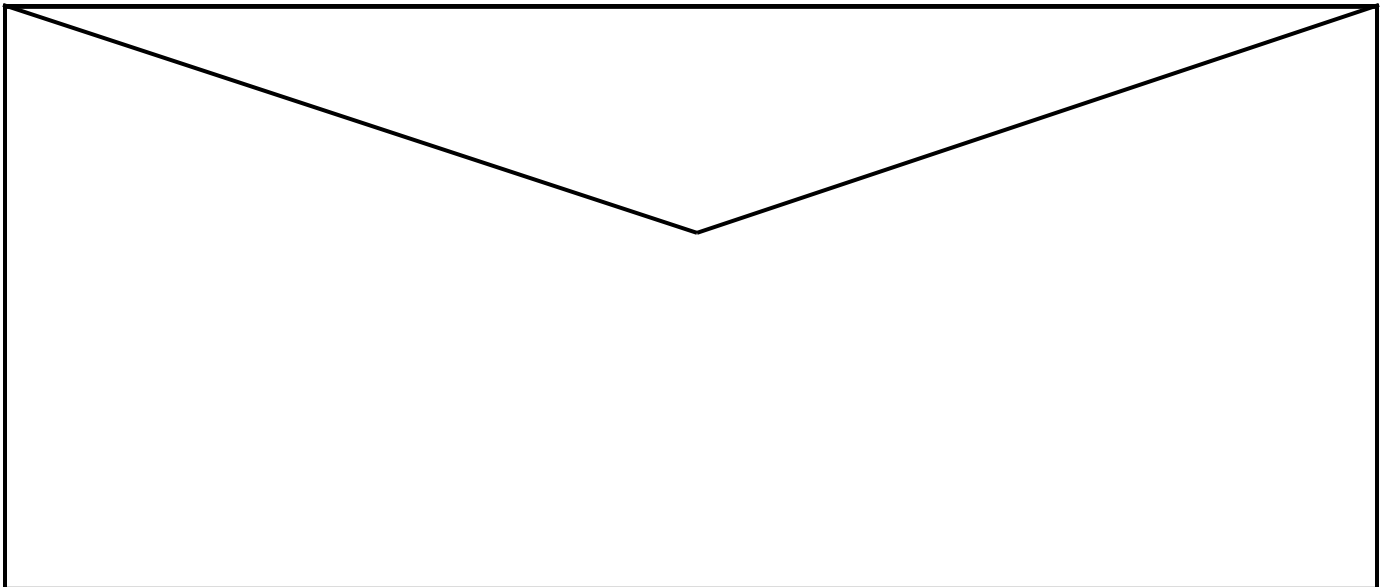


EXHIBIT C

Envelope Front

Barajas v. Schumacher Cargo Logistics
c/o Simpluris, Inc.
P.O. Box 26170
Santa Ana, CA 92799-9834

PRESORTED
FIRST-CLASS MAIL
US POSTAGE
PAID
SIMPLURIS INC

Open immediately. Settlement payment is enclosed.
Abrir inmediatamente. Se adjunta pago de liquidación.

Name
Address
City, St Zip

Envelope Back

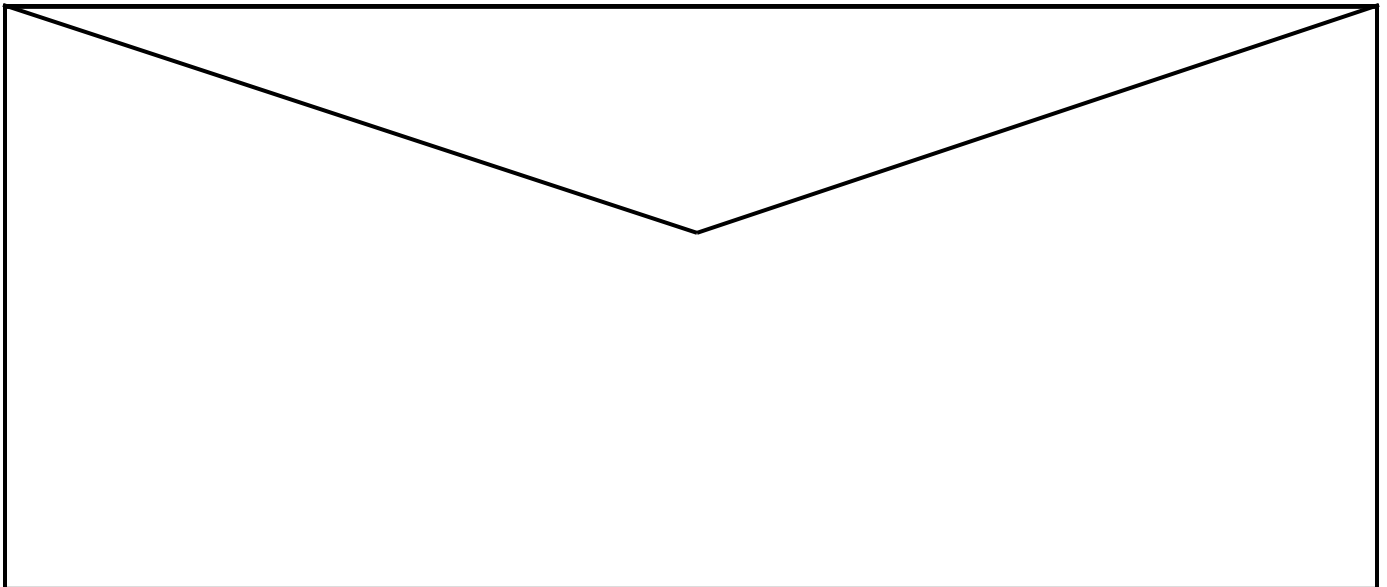


EXHIBIT D



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

Estimate #:	14560	Prepared By:	Kimberly Sutherland
Estimate Date:	3/10/2022	Direct Dial #	321-223-5065
		Email:	ksutherland@simpluris.com

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

Attorney/Client: _____
Firm: _____
Email: _____

Case Name: Barajas v. Schumacher Cargo Logistics: Opt In Settlement

Capped Fee* **\$3,500**

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.

Total Possible Class Size:	70	Undeliverable Rate:	10%
Response Rate:	1%	Call Rate:	5%
Mailing Document Language:	E/S	Fund Distribution:	Simpluris
Reminder Postcard:	No	Redistribution:	No
Unclaimed Funds:	State	State(s):	CA
		Tax Years	One

Case Setup

Data Compilation: Develop Case Specific Response Tracking - Error Reports

Category	Unit Value	# of Units	Total
Project Manager - Case Setup/Posting Online	\$125.00	2	\$250.00
Translation	\$0.25	1500	\$375.00
Database Manager - Initial Data Analysis	\$140.00	1	\$140.00
Total			\$765.00

Notification

Notice Packet: 4/5pg Notice - Double Sided; English

Category	Unit Value	# of Units	Total
Mail Notice Packet	\$0.75	70	\$52.50
Postage	\$0.58	70	\$40.60
NCOA/CASS/LACS	\$0.10	70	\$7.00
Undeliverable Processing	\$0.25	7	\$1.75
Skip Trace RUM	\$1.00	7	\$7.00
Remail Notice	\$1.00	6	\$5.95
Remail Postage	\$0.58	6	\$3.45
Total			\$118.25

Call Center

Establish Case Specific Toll Free Number - not requested

Category	Unit Value	# of Units	Total
Customer Service Reps/Call Center Support	\$75.00	0	\$0.00
800 # Charges	\$0.10	0	\$0.00
Total			\$0.00



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Costa Mesa, CA 92626
800-779-2104 www.simpluris.com

Administration

Process Mail, Opt-Outs or Objections

Category	Unit Value	# of Units	Total
Database Manager	\$125.00	1	\$62.50
Resolving Mismatched TINs	\$75.00	0	\$18.75
Dispute/Deficiencies - Send One Cure Letter	\$2.50	1	\$1.75
Opt In Processing	\$1.00	1	\$0.70
Data Entry	\$50.00	0	\$12.50
Project Manager	\$125.00	1	\$62.50
Weekly Reporting to Counsel	WAIVED	12 Wks of Reporting	\$0.00
Total			\$158.70

Distribution

Setup a Disbursement Account

½ of GSA to be paid within 10 days after effective date (which is final approval) Remaining ½ of GSA to be paid no later than 6 months after the first payment is made

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	\$125.00	1	\$125.00
Disbursement Manager - Data Validation	\$75.00	1	\$75.00
Setup Banking Account/QSF	\$300.00	1	\$300.00
Print & Mail Check	\$2.00	70	\$140.00
Postage	\$0.58	70	\$40.60
Process Returned Checks	\$0.50	1	\$0.35
Skip Trace Search Undeliverable Checks	\$3.00	1	\$2.10
Remail Checks (Includes Postage)	\$3.00	1	\$2.10
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(2023)	\$750.00	1	\$750.00
Reissuing Checks/1099's	\$5.00	0	\$0.05
Escheat Management	\$50.00	1	\$50.00
Disbursement Manager	\$125.00	1	\$125.00
Total			\$2,410.20



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800-779-2104 www.simpluris.com

Case Wrap Up

Send Final Reports to Counsel

Category	Unit Value	# of Units	Total
Data Manager-Final Reporting	\$125.00	0	\$0.00
Total			\$0.00

Postage \$84.65 Total Case Cost: \$3,452.15