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Attorneys for Plaintiff JOAQUIN ROJAS,
individually, and on behalf of all others similarly
situated

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

JOAQUIN ROJAS, individually, and on
behalf of all others similarly situated,

Plaintiff,

vs.

JAR TRANSPORTATION INC., a
California Corporation, RAYMOND
PAUL JUNE, an individual, FEDEX
GROUND PACKAGE SYSTEM, INC., a
Delaware corporation; and DOES 1 through
20, inclusive;

Defendants.

CASE NO. 21STCV15613

**DECLARATION OF JEREMY
TALAVERA ON BEHALF OF CPT
GROUP, INC.**

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I, Jeremy Talavera, declare as follows:

1. I am a Case Manager for CPT Group, Inc. (“CPT”). I have personal knowledge of the facts stated herein, and, if called upon to testify, I could and would testify competently to such facts.

2. CPT has extensive experience in providing notice of class actions and administering class action settlements. In the past 30 years, we have provided notification and/or claims administration services in hundreds of class action cases. Pursuant to the Class Action and PAGA Settlement Agreement (“Settlement Agreement”) for this matter, CPT is responsible for translating, printing and mailing the *Notice of Class Action Settlement and Hearing Date for Final Court Approval* (herein referred to as “Notice Packet”), using the National Change of Address (NCOA) search and Skip Trace to obtain updated and forwarding addresses, resolving any disputes received from Class Members, drafting and mailing the settlement payments to participating Class Members, issuing IRS W2 and 1099 forms accordingly, and performing such other tasks as set forth in the Settlement Agreement or as the parties mutually agree or that the Court orders.

3. CPT received the Court-approved text for the Notice Packet from Counsel on June 19, 2023.

4. CPT finalized an 8-page Notice Packet into English and Spanish. CPT received written approval from all parties and a sufficient number were printed to mail to all Class Members. A true and correct copy of the Notice Packet is attached hereto as **Exhibit A**.

5. On June 27, 2023, CPT received a Class Data file from Defense Counsel that contained names, last known mailing addresses, phone numbers, Social Security numbers and number of approved workweeks. The finalized class list contained 91 Class Members.

6. On July 11, 2023, CPT conducted a National Change of Address (NCOA) search in an attempt to update the class list of addresses as accurately as possible, for all Settlement Class Members. A search of this database provides updated addresses for any individual who

1 moved in the previous four years and notified the U.S. Postal Service of a change of address. As
2 a result of the NCOA, CPT was able to locate 9 updated addresses.

3 7. The Notice Packets were enclosed in envelopes with the names and known
4 addresses printed on them. On July 14, 2023, the Notice Packets were mailed via U.S. first class
5 mail to all Class Members.

6 8. As of the date of this declaration, 2 Notice Packets have been returned to our
7 office by the Post Office, all of which included a forwarding address. For those Notice Packets
8 with a forwarding address, CPT immediately re-mailed those Notice Packets to the forwarding
9 address upon receipt. CPT performed a Skip Trace on all returned mail with no forwarding
10 addresses in an effort to locate a better address using Accurant, one of the most comprehensive
11 address databases available. It utilizes hundreds of different databases supplied by credit
12 reporting agencies, public records and a variety of other national databases.

13 9. As a result of either skip trace, forwarding address provided from the Post Office,
14 or request from counsel or the Class Member themselves, a total of 2 Notice Packets have been
15 re-mailed to date. As of this date, none of the Notice Packets were deemed undeliverable.

16 10. Class Members had until August 28, 2023, to submit objections, disputes and/or
17 requests for exclusion.

18 11. As of the date of this declaration, CPT has not received any written objections to
19 the settlement from Class Members.

20 12. As of the date of this declaration, CPT has not received any disputes from a Class
21 Member regarding their workweeks.

22 13. As of the date of this declaration, CPT has not received any written requests for
23 exclusion.

24 14. As of the date of this declaration, CPT will report that a total of 91 participating
25 Class Members are part of this class action settlement, representing a 100% participation rate. As
26 of the date of this declaration, the total amount to be distributed to participating Class Members
27 is calculated to be \$65,000.00. The lowest payment to a participating Class Member is \$20.36.
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1 The average payment to each participating Class Member is estimated at \$714.29. The highest
2 payment to a participating Class Member is estimated at \$2,255.48.

3 15. CPT will charge a total of \$10,000.00 in costs associated with the administration
4 of the Settlement. This includes all costs incurred to date, as well as estimated costs involved in
5 completing the Settlement.

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7 I declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct. Executed this 11th of September, 2023, at Irvine, California.

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Jeremy Talavera