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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF RIVERSIDE**

11 CHANDRA FINGER, individually, on a
12 representative basis, and on behalf of all others
similarly situated;

13 Plaintiff,

14 vs.

15 PROFESSIONAL REGISTRY HOLDINGS,
16 LLC, a California Limited Liability Company;
17 COACHELLA VALLEY HEALTH
18 PERSONNEL, an Entity
19 Unknown; KEVIN BASS, an Individual;
GEORGE TUCKER, an Individual, KTRVJN
SATTERWHITE, an Individual; and DOES I
through 20, inclusive;

20 Defendants.

Case No. CVRI2101956

Hon. Craig Riemer

CLASS ACTION

**DECLARATION OF EVELIN REYES
REGARDING NOTICE AND
SETTLEMENT ADMINISTRATION**

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DECLARATION OF EVELIN REYES

I, Evelin Reyes, hereby declare:

1. I am employed as a Case Manager by Simpluris, Inc. (“Simpluris”), the claims administrator in the above-entitled action. Our Corporate Office address is 3194-C Airport Loop Drive, Costa Mesa, CA 92626. My telephone number is (714) 640-5654. I am over twenty-one years of age and authorized to make this declaration on behalf of Simpluris and myself.

2. Simpluris is a Class Action Settlement Administration company located in Costa Mesa, California. It was founded by individuals who have each managed hundreds of settlements, along with professionals in the areas of Software Development, Third-Party Claims Administration, Mail-House Operations, and Call Center Support Management.

3. Simpluris was approved by Counsel for Chandra Finger (“Plaintiffs”), and Professional Registry Holdings, LLC, Kevin Bass, George Tucker, and Kirvin Satterwhite (“Defendant”), (collectively the “Parties”), to provide settlement administration services in the *Finger v. Professional Registry Holdings, LLC, et al.* case (“Settlement”). In this capacity, Simpluris was charged with (a) establishing and maintaining a related settlement fund account; (b) establishing and maintaining a calendar of administrative deadlines and responsibilities; (c) processing and mailing payments to the Plaintiffs, Class Counsel and Class Members; (d) printing and mailing the Notice of Proposed Class Action Settlement to Class Members; (e) receiving and validating Requests for Exclusion, Objections or Disputes of Work Weeks submitted by Class Members; (f) calculating Employer Payroll Taxes and providing appropriate forms and calculations to Defendant; (g) mailing settlement checks, and (h) other tasks as the Parties mutually agree or the Court orders Simpluris to perform.

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TOLL FREE TELEPHONE HELPLINE

4. A toll-free telephone number was included in the Class Notice for the purpose of allowing the Class Members to call Simpluris and to make inquiries regarding the Settlement. The system is accessible in English and Spanish 24 hours a day, 7 days a week, and will remain in operation throughout the settlement process. Callers have the option to speak with a live call center

1 representative during normal business hours or to leave a message and receive a return call during non-
2 business hours. Spanish-speaking representatives are available during normal business hours. The toll-
3 free telephone number included in the Notice of Proposed Class Action Settlement was (888) 369-3780
4 and was live on April 1, 2022.

5 6 NOTIFICATION TO THE CLASS

7 5. On February 9, 2022, Simpluris received the Court-approved Notice of Proposed Class
8 Action Settlement (hereafter “Notice Packet”). The Notice Packet advised Class Members of their right
9 to request exclusion from the Settlement, object to the Settlement, do nothing, and the implications of
10 each such action. The Notice Packet advised Class Members of applicable deadlines and other events,
11 including the Final Approval Hearing, and how Class Members could obtain additional information.

12 6. On February 25, 2022, Counsel for Defendant provided Simpluris with a mailing list
13 (“Class List”) containing Class Members’ names, most recent mailing address and telephone numbers,
14 social security numbers, and pertinent employment information for each Class Member during the
15 Class Period. The Class List contained data for two hundred sixty-four (264) Class Members.

16 7. The mailing addresses contained in the Class List were processed and updated utilizing
17 the National Change of Address Database (“NCOA”) maintained by the U.S. Postal Service. The
18 NCOA contains requested changes of address filed with the U.S. Postal Service. In the event that any
19 individual had filed a U.S. Postal Service change of address request, the address listed with the NCOA
20 would be utilized in connection with the mailing of the Notice Packets.

21 8. Due to an internal calendaring error, Simpluris failed to timely mail the Notice Packets
22 within the time period set forth in the Court’s Order. However, on April 1, 2022, Notice Packets were
23 mailed in both English and Spanish to two hundred sixty-four (264) Class Members with addresses
24 contained in the Class List via First Class mail or updated via the NCOA search. A copy of the Notice
25 Packet is attached hereto as **Exhibit A**.

26 9. If a Class Member’s Notice Packet was returned by the USPS as undeliverable and
27 without a forwarding address, Simpluris performed an advanced address search (i.e. skip trace) on all of
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1 these addresses by using Accurant, a reputable research tool owned by Lexis-Nexis. Simpluris used the
2 Class Member's name and previous address to locate a current address. Through the advanced address
3 search, Simpluris was able to locate thirty (30) updated addresses and Simpluris promptly mailed the
4 Notice Packets to those updated addresses. Ultimately, there were eight (8) Notice Packets that were
5 undeliverable.

6 7 SETTLEMENT AWARDS

8 10. As of this date, there are two hundred sixty-four (264) Class Members who will be paid
9 their portion of the Net Settlement Amount.

10 11. The Net Settlement Amount of \$259,856.92 available to pay Class Members was
11 determined by subtracting the Class Counsel's Fees (\$166,666.66), Class Counsel's Costs Payment
12 (\$9,977.42), Named Plaintiff Service Award (\$7,500.00), the PAGA Penalties to the LWDA and
13 Aggrieved Employees (\$50,000.00) and the Administration Costs (\$5,999.00) from the Maximum
14 Settlement Amount (\$500,000.00).

15 12. As of this date, \$259,856.92 of the Net Settlement Amount will be disbursed to the
16 Participating Class Members. The ***average estimated payment*** is \$936.96, the ***highest estimated***
17 ***payment*** is \$6,952.53 and the ***lowest estimated payment*** is \$26.44. The total number of weeks worked
18 by all 264 Class Members during the Class Period is 9,357.00, meaning that the value per each
19 Workweek is \$26.44. In addition, there are a total of 120 Aggrieved Employees, who will share in the
20 \$12,500 PAGA fund (which is 25% of the allocation to PAGA Penalties) on a *pro-rata* basis, with each
21 Aggrieved Employee receiving \$104.17 on average. The Aggrieved Employees collectively worked
22 3,208 work weeks during the PAGA Period.

23 REQUESTS FOR EXCLUSION, OBJECTIONS AND DISPUTES

24 13. As of this date, Simpluris has not received any ***valid*** Requests for Exclusion from Class
25 Members. However, Simpluris has received one Request for Exclusion which was deemed by
26 Simpluris to be invalid because the box was not checked indicating that the Class Member wishes to
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1 Opt-Out Simpluris is in the process of attempting to contact the employee to resolve the deficiency. A
2 true and correct copy of the invalid Request for Exclusion is attached hereto as **Exhibit B**.

3 14. As of this date, Simpluris has not received any Objections to the Settlement from Class
4 Members.

5 15. As of this date, Simpluris has not received any Disputes of Work Weeks from Class
6 Members.

7 16. The Notice Response Deadline ends on May 17, 2022. Therefore, I will promptly
8 submit an updated declaration as soon as possible after May 17, 2022, with the final results of the
9 Notice Process.

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11 **ADMINISTRATION COSTS**

12 17. Simpluris' total costs for services in connection with the administration of this
13 Settlement, including fees incurred and anticipated future costs for completion of the administration, are
14 \$5,999.00. Simpluris' work in connection with this matter will continue with the calculation of the
15 settlement checks, issuance and mailing of those settlement checks, etc., and to do the necessary tax
16 reporting on such payments. A true and correct copy of Simpluris flat fee proposal is attached hereto as
17 **Exhibit C**.

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20 I declare under penalty of perjury under the laws of the State of California that the foregoing is
21 true and correct. Executed this 4th day of May, 2022, in Costa Mesa, California.

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24 EVELIN REYES
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