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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE

JAVIER SANTIAGO, individually, and on
behalf of all others similarly situated,

Plaintiff,

v.

CAL TECH PRECISION, INC. a California
corporation; and DOES 1 through 10, inclusive,

Defendants.

Case No. 30-2021-01195725-CU-OE-CXC

**SUPPLEMENTAL DECLARATION OF
WILLIAM ARGUETA ON BEHALF OF
CPT GROUP, INC. WITH RESPECT
TO NOTIFICATION, PROOF OF
PROCESSING AND REQUEST FOR
EXCLUSION**

Judge: Hon. David A. Hoffer
Date: April 27, 2026
Time: 1:30 p.m.
Department: CX103

1 I, WILLIAM ARGUETA, DECLARE AS FOLLOWS:

2 1. I am employed by CPT Group, Inc., the court appointed class action claims
3 administrator, as Case Manager for *Santiago v. Cal Tech Precision, Inc.* and have personal
4 knowledge of the facts set forth in this Declaration, and if called as a witness, could and would
5 testify competently thereto.

6 2. I submit this declaration to supplement and update the Declaration Regarding
7 Notice and Claims Administration dated December 31, 2025.

8 3. Following receipt and review of the final class data provided by Defense Counsel,
9 CPT determined that the total number of Class Members is 237, rather than the originally
10 estimated 219. CPT confirms that Notice was mailed to all 237 Class Members.

11 4. As of the date of this declaration, 14 Notice Packets were returned to our office
12 by the U.S. Postal Service as undeliverable with no forwarding address and none have been
13 forwarded directly by the Post Office to a forwarding address. CPT performed a Skip Trace on
14 all returned mail with no forwarding address in an attempt to locate a better address using
15 Accurant, one of the most comprehensive databases available. It utilizes hundreds of different
16 databases supplied by credit reporting agencies, public records and a variety of other national
17 databases.

18 5. As of the date of this declaration, four (4) Notices were re-mailed during the
19 response period as a result of locating a better address after Skip Trace or Class Member request.
20 Therefore, there are ultimately 11 undeliverable Notices.

21 6. The deadline for Class Members to dispute the number of workweeks used to
22 calculate their settlement shares was January 26, 2026. As of the date of this declaration, CPT
23 has not received any disputes.

24 7. The deadline for Class Members to request exclusion from the Settlement was
25 January 26, 2026. As of the date of this declaration, CPT has not received any Requests for
26 Exclusion.
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28

1 8. The deadline for Class Members to object to the Settlement was January 26, 2026.
2 As of the date of this declaration, CPT has not received any Objections to the Settlement or any
3 portion thereof.

4 9. CPT reports a total of 237 Class Members are part of this Settlement, which
5 represents a 100% participation rate.

6 10. Pursuant to the terms of the Settlement Agreement, the Net Settlement Amount
7 will be calculated by (a) dividing the Net Settlement Amount by the total number of Workweeks
8 worked by all Participating Class Members during the Class Period and (b) multiplying the
9 result by each Participating Class Member's Workweeks. Each Aggrieved Employee's
10 Individual PAGA Payment will be calculated by (a) dividing the amount of the Aggrieved
11 Employees 25% share of PAGA Penalties (\$2,500) by the total number of PAGA Pay Periods
12 worked by all Aggrieved Employees during the PAGA Period and (b) multiplying the result by
13 the Aggrieved Employee's PAGA Pay Periods. As of the date of this declaration, the estimated
14 Net Settlement Amount available to the Class Members is as follows:

15	Gross Settlement Amount	\$350,000.00
16	Less Attorney's Fees (Requested)	\$116,666.67
17	Less Litigation Costs/Expenses	\$13,635.31
18	Less Service Awards (Requested)	\$10,000.00
19	Less PAGA Payment to the LWDA	\$7,500.00
20	Less PAGA Penalties (Aggrieved Employees)	\$2,500.00
21	<u>Less Settlement Administration Costs</u>	<u>\$8,500.00</u>
22	Remaining Estimated Net Settlement Amount	\$191,198.02

23 11. The estimated average net settlement payment to each Class Member is \$806.74.
24 The highest estimated net settlement payment is \$1,995.21 and the lowest individual payment
25 is \$7.13. The Named Plaintiff, Javier Santiago, is estimated to receive \$1,389.52 for his
26 Settlement Payment.

27 12. As of the date of this declaration, CPT reports a total of 156 PAGA Employees
28 who will be sent a PAGA payment. The highest individual PAGA payment is \$25.47, the

1 average individual PAGA payment is \$16.03 and the lowest individual PAGA payment is
2 \$0.41. The Named Plaintiff, Javier Santiago, is estimated to receive \$8.22 for his PAGA
3 payment.

4 13. CPT will charge a total of \$8,500.00 in costs associated with the administration
5 of the Settlement. This amount includes all costs incurred to date, as well as estimated costs
6 involved in completing the Settlement. A true and correct copy of CPT Group, Inc.'s invoice
7 confirming the administration costs is attached hereto as **Exhibit A**.

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9 I declare under penalty of perjury under the laws of the State of California that the
10 foregoing is true and correct and that this declaration is executed on February 9, 2026, at Irvine,
11 California.

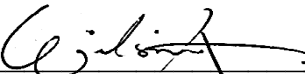
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EXHIBIT A

CASE NAME: Santiago v. Cal Tech Precision

Date: February 9, 2026
Invoice #: 18270

All-In Settlement

Class Size: 237
Opt-Out Rate: 0.0%
No. of Checks Issued: 237
Postage Total: \$445.12
Grand Total: \$12,030.74

DISCOUNTED FLAT FEE: \$8,500.00

CASE SETUP

ADMINISTRATIVE TASKS	UNIT PRICE	PIECES/HOURS	COST ESTIMATE
Project Manager: Case Intake & Review	\$95.00	2	\$190.00
Programming: Data Base Setup	\$150.00	2	\$300.00
Spanish Translation	\$1,200.00	1	\$1,200.00
Static Website	\$500.00	1	\$500.00
Dedicated Case Email Address	\$150.00	2	\$300.00
TOTAL			\$2,490.00

DIRECT MAIL NOTICE

ADMINISTRATIVE TASKS	UNIT PRICE	PIECES/HOURS	COST ESTIMATE
Project Manager: Format Documents	\$95.00	2	\$190.00
National Change of Address Search (NCOA)	\$135.00	1	\$135.00
XML Lex ID Skip Trace	\$0.85	24	\$20.40
Print & Mail Notice Packets	\$1.50	237	\$355.50
First-Class Postage (up to 2 oz.)*	\$1.03	237	\$244.11
TOTAL			\$945.01

PROCESS RETURNED UNDELIVERABLE MAIL

ADMINISTRATIVE TASKS	UNIT PRICE	PIECES/HOURS	COST ESTIMATE
Clerical Staff	\$60.00	1	\$60.00
Update Undeliverable Mail Database	\$0.50	15	\$7.50
Skip Trace for Best Address	\$1.00	15	\$15.00
Print & Remail Notice Packets	\$1.50	4	\$6.08
First-Class Postage (up to 2 oz.)	\$1.03	4	\$4.17
TOTAL			\$92.75

OPT-OUT PROCESSING

ADMINISTRATIVE TASKS	UNIT PRICE	PIECES/HOURS	COST ESTIMATE
Programming: De-duplication/Scrubbing	\$150.00	1	\$150.00
Project Manager: Validate Opt-Out Requests	\$95.00	0	\$0.00
Clerical Staff	\$60.00	0	\$0.00
Opt-Out & Change of Address Processing	\$2.00	0	\$0.00
Print & Mail Deficiency/Dispute Notices	\$1.50	0	\$0.00
First-Class Postage (up to 1 oz.)	\$0.74	0	\$0.00
Review & Process Deficiency Responses	\$10.00	0	\$0.00
TOTAL			\$150.00

TELEPHONE SUPPORT

ADMINISTRATIVE TASKS	UNIT PRICE	PIECES/HOURS	COST ESTIMATE
Toll-Free Number Establish/Setup	\$150.00	2	\$300.00
Live Call Center Support Reps.	\$3.00	48	\$144.00
TOTAL			\$444.00

SSN VERIFICATION

ADMINISTRATIVE TASKS	UNIT PRICE	PIECES/HOURS	COST ESTIMATE
Programming: SSN Selection	\$150.00	1	\$150.00
Department Manager: Analysis & Reporting	\$95.00	3	\$285.00
IRS SSN Verification	\$0.10	237	\$23.70
TOTAL			\$458.70

DISTRIBUTION SERVICES

ADMINISTRATIVE TASKS	UNIT PRICE	PIECES/HOURS	COST ESTIMATE
Programming: Calculation Totals	\$150.00	3	\$450.00
Project Supervisor: Review of Distribution	\$150.00	3	\$450.00
Project Manager: Correspondence w/Parties	\$95.00	2	\$190.00
Programming: Setup & Printing of Checks	\$150.00	3	\$450.00
Obtain EIN, Setup QSF/Bank Account	\$150.00	3	\$450.00
Print & Mail Notice, Checks & W2/1099	\$2.50	237	\$592.50
First-Class Postage (up to 1 oz.)*	\$0.74	237	\$175.38
TOTAL			\$2,757.88

POST-DISTRIBUTION & TAX REPORTING

ADMINISTRATIVE TASKS	UNIT PRICE	PIECES/HOURS	COST ESTIMATE
Project Supervisor: Account Reconciliation	\$150.00	10	\$1,500.00
Update Undeliverable Checks Database	\$0.50	19	\$9.48
Skip Trace for Best Address	\$1.00	19	\$18.96
Remail Undeliverable Checks	\$2.50	17	\$42.50
First-Class Postage (up to 1 oz.)	\$0.74	17	\$12.58
Re-Issue Checks as Required	\$5.00	12	\$60.00
First-Class Postage (up to 1 oz.)	\$0.74	12	\$8.88
Project Supervisor: Reconcile Uncashed Chk	\$150.00	1	\$150.00
Programming: Weekly & Final Reports	\$150.00	2	\$300.00
Project Supervisor: Final Declaration	\$150.00	2	\$300.00
Project Manager: Account Files Sent to Atty	\$95.00	2	\$190.00
CA Tax Preparation*	\$600.00	1	\$600.00
Annual Tax Reporting to IRS*	\$1,000.00	1	\$1,000.00
QSF Annual Tax Reporting	\$500.00	1	\$500.00
Uncashed Checks Sent to Cy pres	Included	1	Included
TOTAL			\$4,692.40

GRAND TOTAL	\$12,030.74
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