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Attorneys for Rebecca De Benning, on behalf of herself
and all others similarly situated,

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SACRAMENTO

REBECCA DE BENNING, on behalf of
Herself and all others similarly situated,

Plaintiff,

v.

COSTCO WHOLESALE CORPORATION,
a Washington Corporation: and Does 1
Through 10, Inclusive,

Defendants.

Case No.: 34-2021-00309030

ASSIGNED FOR ALL PURPOSES TO:

The Honorable Jill H. Talley

Department 25

**SUPPLEMENTAL DECLARATION OF
BRYN BRIDLEY RE CLASS NOTICE AND
SETTLEMENT ADMINISTRATION**

Date: February 10, 2023

Time: 9:00 a.m.

Dept: 25

Judge: Honorable Jill H. Talley

Complaint filed: September 30, 2021

Trial Date: Not Set

1 I, Bryn Bridley, declare as follows:

2 1. I am the Director of Project Management at Atticus Administration, LLC
3 (“Atticus”), a firm providing class action and claims administration services. I am over the age of
4 twenty-one and I have extensive experience with class action notice and claims administration. I
5 am fully familiar with the facts contained herein based upon my personal knowledge and
6 involvement in this matter.

7 2. Atticus is Settlement Administrator for the above-captioned action and is
8 responsible for administering the terms of the *Class and PAGA Action Settlement Agreement*
9 (“Settlement Agreement”) pursuant to the Court’s *Order Granting Preliminary Approval of*
10 *Class Action Settlement* (“Preliminary Approval Order”) dated October 28, 2022.

11 3. I submit this declaration to supplement the *Declaration of Bryn Bridley Re Class*
12 *Notice and Settlement Administration* (“Bridley Declaration”) dated January 19, 2023 with
13 regard to: (i) providing Class Notice (“Notice”) to members of the Settlement Class, (ii) the
14 receipt and processing of timely postmarked Requests for Exclusion and objections, (iii) Class
15 Member communications, and (iv) Class payments.

16 **I. PROVIDING NOTICE TO THE SETTLEMENT CLASS**

17 4. Of the total 52,871 Notices mailed, 1,909 were returned to Atticus as
18 undeliverable. Of the Notices returned, 429 included forwarding information and Notices were
19 promptly remailed to the forwarding addresses. Of the remaining undeliverable records, 1,466
20 were sent to a professional service for address tracing. New addresses were obtained for 1,169 of
21 the traced records and Notices were promptly remailed to those 1,169 Class Members. Ninety-
22 four (94) of the remailed Notices were returned to Atticus a second time. New address
23 information was not obtained for the remaining 277 records processed through trace. Thirty-four
24 (34) undeliverable records were not processed via trace because they were returned at or after the
25 response deadline. Those undeliverable records and any additional undeliverable records
26 received will be traced prior to the distribution of settlement awards. Thus, in total, 52,466
27 Notices or 99.23% of the pieces sent were believed to have been successfully mailed.

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II. EXCLUSION REQUESTS AND SETTLEMENT OBJECTIONS

5. Class Members who did not wish to participate in this settlement had the right to submit a request for exclusion postmarked no later than January 26, 2023. Twenty-six (26) Class Members have submitted Requests for Exclusion as follows: Rhonda Wallace, Debra Jo Ruth, Eliseo Elizarraraz, Connie Alvarado, Nicolas Ramirez, Samantha Hudson, Gloria Capangan, Charlotte Rebecca Brooks, Francisco Buendia, Linda Lockman, Deborah Lynn Soto, Minh-Ngoc Nguyen, Sharon Valdez, Cosimo Cricchio, Bradley Little, Ester Salas, Michael Williams, Jackie Thao Nguyen, Gail Gutierrez, Lydia Torres, Sharman Grant, Denisse Naylonnnavarette, Emmanuel Nkuyata Kantirro, Gillian Mangiapane, Andrew Ong, and Jennifer Heydon. These individuals will not be eligible for payments from the Net Settlement Fund but will still receive PAGA Payments if they are also Aggrieved Employees.

6. Class Members who do not agree with the terms of the Settlement also had the right to submit a written objection by no later than January 26, 2023. Atticus did not receive any settlement objections.

III. CLASS MEMBER COMMUNICATIONS

7. The settlement website (www.CostcoWageandHourSettlement.com) and the toll-free telephone number (1-800-542-9873) obtained and established by Atticus for use in this action have remained fully operational and accessible since the Notice Mail date of December 12, 2022. The website has received 156 visits to-date. Atticus has currently received 29 total calls on the toll-free information line.

IV. CLASS PAYMENTS

8. Class Members' shares of the Net Settlement Amount, estimated to be \$5,542,983, were allocated on a pro rata basis according to the number of paid sick leave hours taken by each Settlement Class Member in relation to the credited number of Total Paid Sick Leave Hours taken by all Settlement Class Members who have not Requested Exclusion and are eligible for payments from the Net Settlement Fund. The cumulative Settlement Class of 52,871 members, includes 11,537,384.80 actual sick hours and 11,664,854.80 total sick hours. Pursuant to § 6.6.2 of the Settlement Agreement, each Former Employee was credited with 10 additional

1 paid sick leave hours to account for the additional § 203 claim available to Former Employees,
2 which increased the total Settlement sick hours to 11,664,854.80. As the total hours of the
3 26 Class Members who requested exclusion total 4,763.36, however, the final award
4 calculations will be based upon 11,660,091.44 hours. The highest estimated Settlement Class
5 Payment is \$380.81, and the estimated average award is \$104.89. The estimated payment to the
6 Named Plaintiff, Rebecca De Benning, is \$118.84.

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8 **I certify under penalty of perjury under the laws of the State of California and of**
9 **the United States that the foregoing is true and correct. This declaration was executed on**
10 **the 3rd day of February 2023 in Mendota Heights, Minnesota.**

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13 A handwritten signature in dark ink, appearing to read 'Bryn Bradley', is written over a printed name. The signature is stylized with loops and flourishes.
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