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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

**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 Direct 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

8 2. Atticus is Settlement Administrator for the above-captioned action and is
9 responsible for administering the terms of the *Class and PAGA Action Settlement Agreement*
10 (“Settlement Agreement”) pursuant to the Court’s *Order Granting Preliminary Approval of*
11 *Class Action Settlement* (“Preliminary Approval Order”) dated October 28, 2022.
12

13 3. I submit this declaration to inform the Parties and the Court of settlement
14 administration activities completed to date. This declaration describes: (i) providing *Notice of*
15 *Class and Representative Action Settlement* (“Class Notice” or “Notice”) to members of the
16 Settlement Class, (ii) the settlement website and toll-free telephone number, (iii) the receipt and
17 processing of exclusion requests and settlement objections, and (iv) estimated Class and PAGA
18 payments and distribution plans.
19

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

21 4. On November 21, 2022, Atticus received a data file from Defense Counsel that
22 contained the full name, address, email address, telephone number, employee identification
23 number, social security number, termination date and total sick hours for 52,871 individuals who
24 worked for Costco in California between September 30, 2017 and July 6, 2022 (“Settlement
25 Period”) in a non-exempt role and earned wages at more than one rate during a week when they
26 took paid sick leave, took paid sick leave from March 2, 2020 through February 29, 2021, or
27 took sick leave during the six-month measuring period prior to receiving an Extra Check (“Class
28

Members,” or the “Settlement Class”). The data file also provided the number of pay periods worked for 45,784 of the Class Members who between September 30, 2020 through July 6, 2022 (“PAGA Period”) took sick time (“PAGA Group Members,” or “Aggrieved Employees”). Atticus reviewed the data file and found no errors or inconsistencies in its content. The final Class list included 52,871 Class Members of which 45,784 were also Aggrieved Employees.

5. Prior to mailing the Class Notice, the Settlement Class list was processed through the National Change of Address database maintained by the United States Postal Service (“USPS”). This process updates addresses for individuals that have moved within the last four (4) years and who have filed a change of address card with the USPS.

6. On December 12, 2022, the Class Notice was sent by U.S. first-class mail to 52,871 Class Members. A true and correct copy of the Notice is attached hereto as **Exhibit A**.

7. Of the total 52,871 Notices mailed, 1,849 have been returned to Atticus as undeliverable. Of the Notices returned, 424 have included forwarding information and Notices were promptly remailed to the forwarding addresses. At the time this declaration was written, 1,425 of the remaining undeliverable mail records had been sent to a professional service for address tracing. New addresses were obtained for 1,152 of the traced records and Notices were promptly remailed to those 1,152 Class Members. Fourteen (14) of the remailed Notices have been returned to Atticus a second time. New address information was not obtained for the 272 records processed through trace, and one (1) undeliverable record had not yet been traced. Thus, at this time, 99.46% of the Notices are believed to have been successfully mailed.

8. Atticus will continue to remail forwarding Notices and undeliverable Notices for which trace addresses are obtained until the end of the Consideration Period (January 26, 2023).

1 **II. SETTLEMENT WEBSITE AND TOLL-FREE TELEPHONE NUMBER**

2 9. Atticus established a settlement website at the URL
3 www.CostcoWageandHourSettlement.com that was activated on December 12, 2022 in
4 correlation with the Notice mailing. The website address was printed in the mailed Notice. The
5 site provides visitors with access to the Notice, important settlement dates and deadlines, legal
6 documents filed with the Court, answers to frequently asked questions about the settlement, and
7 Atticus' contact information. The website continues to be operational at this time and has
8 received 132 visits as of the date of this declaration.
9

10 10. On December 12, 2022, Atticus also activated the toll-free telephone number 1-
11 800-542-9873 as the settlement information line. The toll-free number was included in the
12 Notice and on the website. The toll-free line is answered by live customer service specialists
13 during Atticus' normal business hours of 8:00 a.m. to 4:00 p.m. CT, Monday through Friday.
14 After hours or if a support specialist is unavailable to answer a live call, individuals are allowed
15 to leave voicemail messages and receive callbacks from Atticus' support team. To date, the toll-
16 free line has received a total of 26 calls. The toll-free telephone number has been continuously
17 operational since it was activated and remains accessible at this time.
18

19 **III. EXCLUSION REQUESTS AND SETTLEMENT OBJECTIONS**

20 11. Class Members who do not wish to participate in the class action portion of the
21 settlement are allowed to exclude themselves or "opt-out" of the Settlement. Requests for
22 Exclusion must be postmarked or otherwise received by Atticus no later than January 26, 2023,
23 which is the date 45 days after Notices were mailed.
24

25 12. Seventeen (17) Class Members have submitted Requests for Exclusion to date as
26 follows: Rhonda Wallace, Debra Jo Ruth, Eliseo Elizarraraz, Connie Alvarado, Nicolas Ramirez,
27 Samantha Hudson, Gloria Capangan, Charlotte Rebecca Brooks, Francisco Buendia, Linda
28

1 Lockman, Deborah Lynn Soto, Minh-Ngoc Nguyen, Sharon Valdez, Cosimo Cricchio, Bradley
2 Little, Ester Salas, and Michael Williams. These individuals will not be eligible for payments
3 from the Net Settlement Fund but will still receive PAGA Payments if they were also identified
4 as Aggrieved Employees.

5 13. Class Members who do not agree with the terms of the Settlement also have the
6 right to submit a written objection by no later than January 26, 2023. Atticus has not received
7 any settlement objections at this time.
8

9 **VI. CLASS AND PAGA PAYMENTS**

10 14. In accordance with § 6 of the Settlement Agreement, Individual Settlement
11 Payments and Individual PAGA Payments will be distributed within 35 calendar days of
12 Effective Date. The checks will include the expiration date 180 days from the date they are
13 mailed. Payments will be allocated 60% to non-wages and 40% to wages and IRS Forms 1099
14 and W-2 will accompany the mailed payments.
15

16 15. The Class Notice included each Class Member's individual credited number of
17 paid sick leave hours taken and their estimated settlement award amount. To calculate the
18 payments, the Gross Settlement Amount (\$9,000,000) was reduced by the amounts anticipated
19 by the Settlement Agreement for the Service Award (\$10,000), PAGA Payment (\$300,000),
20 Administrative Costs (\$128,682), the Class Counsel Award (\$3,000,000), and the litigation costs
21 (\$20,000)¹ to establish the Net Settlement Amount (\$5,541,318) used to calculate estimated
22 settlement award payments. Estimated payments were calculated pursuant to § 6.6 of the
23 Settlement Agreement assuming 100% Settlement Class participation.
24
25
26

27 ¹ The \$20,000 for litigation costs was used for the purposes of calculating estimated settlement award payments.
28 Atticus has been made aware that the actual litigation costs will be \$18,335, which will increase the Net Settlement Amount available to Class Members by \$1,665.

1 16. Class Members' shares of the Net Settlement Amount were allocated on a pro rata
2 basis according to the number of paid sick leave hours taken by in relation to the credited
3 number of Total Paid Sick Leave Hours Taken by all Settlement Class Members. The cumulative
4 Settlement Class included 11,665,108.61 paid sick hours. The highest estimated Settlement Class
5 Payment was \$380.52, and the estimate average award amount was \$104.81. The estimated
6 payment to the Named Plaintiff, Rebecca De Benning, was \$118.75.
7

8 17. Following the expiration of the Consideration Period and upon the Court's entry
9 of a Final Approval Order, Atticus will recalculate the actual Settlement Class payments
10 accounting for the Court-approved award amounts to be deducted from the Gross Settlement
11 Amount and those Class Members who submitted valid Requests for Exclusion.
12

13 18. Aggrieved Employees will also receive Individual PAGA Payments in accordance
14 with the number of pay periods they worked during the PAGA Period in relation to the total
15 number of pay periods worked by all Aggrieved Employees. If the Court approves the \$300,000
16 PAGA Payment amount, the LWDA will receive a payment of \$225,000. The remaining \$75,000
17 will be distributed to PAGA Group Members. The PAGA Group Members worked a total of
18 1,835,862 pay periods during the PAGA Period.
19

20 19. The cost of administration for this matter was estimated to be \$128,682. A copy
21 of Atticus Administration's service estimate is attached hereto as **Exhibit B**.
22

23 20. Atticus will send a check cashing reminder to any Class Members and Aggrieved
24 Employees who have not cashed their award payments within 30 days of the check negotiation
25 deadline. Atticus will void any payments that remain uncashed after the cashing deadline has
26 passed and the funds will be transmitted in equal amounts to the legal non-profit entities the Los
27 Angeles Center for Law and Justice and Legal Aid at Work consistent with Code of Civil
28 Procedure § 384.

1 I certify under penalty of perjury under the laws of the State of California and of
2 the United States that the foregoing is true and correct. This declaration was executed on
3 the 19th day of January 2023 in Mendota Heights, Minnesota.
4

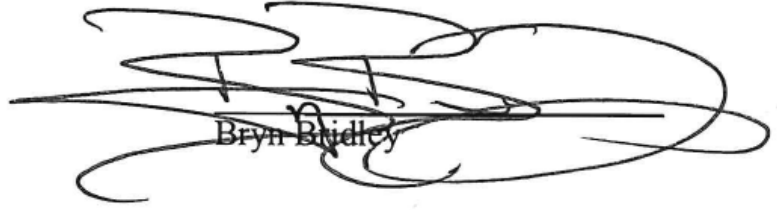
5
6 A handwritten signature in dark ink, appearing to read 'Bryn Bradley', is written over a printed name. The signature is stylized with large, sweeping loops and a horizontal line extending to the left.
7 Bryn Bradley
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EXHIBIT A

DE BENNING V COSTCO
C/O ATTICUS ADMINISTRATION
PO BOX 64053
SAINT PAUL MN 55164

<<claimant_id>>



<<Claimant ID>> <<SEQ ID>>

<<FIRST NAME>> <<LAST NAME>>
<<ADDRESS>> <<ADD ADDRESS 2>>
<<CITY>> <<STATE>> << ZIP>>

NOTICE OF CLASS AND REPRESENTATIVE ACTION SETTLEMENT*Rebecca De Benning v. Costco Wholesale Corporation***PLEASE READ THIS NOTICE AS IT MAY AFFECT YOUR LEGAL RIGHTS.****THE FOLLOWING INFORMATION IS IN THIS NOTICE**

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1. Why Did I Get This Notice?

A proposed Settlement has been reached in an action entitled *Rebecca De Benning v. Costco Wholesale Corp.*, Sacramento Superior Court Case No. 34-2021-00309030. This Notice is being sent to you by order of that Court, which has preliminarily approved the Settlement and conditionally certified a class. Because your rights may be affected by this Settlement, you should read this Notice carefully.

This Notice briefly describes the claims alleged, the key Settlement terms, and your rights and options. Unless you timely request to be excluded, the Settlement, if finally approved by the Court, will be binding on you. The Court has not determined whether Costco broke any law. Both sides agreed to settle the case without agreeing who is right or wrong, in order to avoid the risks and cost of a trial. Costco expressly denies that it did anything wrong or that it violated the law and further denies any liability whatsoever to Plaintiff or to the Class.

2. What is this Case About?

The Plaintiff, Rebecca De Benning, sued Costco on September 30, 2021 in Sacramento Superior Court (case no. No. 34-2021-00309030) (the “Lawsuit”), seeking restitution, penalties, interest, costs, attorneys’ fees, and other relief for (1) failure to pay sick pay (Cal. Lab. Code §§ 245, 246), (2) failure to pay earned wages upon termination (Cal. Lab. Code §§ 201, 202, 203), and (3) unfair business practices (Cal. Bus. & Prof. Code § 17200 et seq.). This part of the case is called the Class Action and the affected employees are the Class Members, who will receive an Individual Settlement Payment unless they opt out of the class as described below.

The case also seeks civil penalties under the California Private Attorneys General Act of 2004 (“PAGA”) for alleged violations of the California Labor Code sections mentioned above. This part of the case is known as the PAGA Action and the affected employees (called the PAGA Group members) will receive a payment from this portion of the Settlement regardless of whether they opt out of participating in the Class Action.

3. What is a “Class Action”?

In a class action, a class representative sues on behalf of people who are in a position to make similar claims. In this case, Rebecca De Benning is the class representative. Costco is the Defendant. A class action allows a court to resolve at one time all the issues for all the Class Members who do not exclude themselves from the class. A Class Member is bound by the judgment entered in the case, whether the class wins or loses, and may not sue over the same claims that were decided in the class action.

4. Am I a Class Member or PAGA Group Member?

You are a Class Member if you have not sued Costco on a claim released by this Settlement and if—at any time since September 30, 2017—you have worked for Costco in California as a non-exempt employee, other than as a Depot employee, and have (a) earned wages at more than one rate during a week when you took paid sick leave, (b) taken paid sick leave at any time during the period March 2, 2020 through February 28, 2021, or (c) taken sick leave at any time during the six month measuring period prior to receiving an Extra Check. As a Class Member, you will receive a payment because of this Settlement unless you opt out of the class in the manner described below.

You are a PAGA Group member if you—at any time since September 30, 2020—worked as a non-exempt employee for Costco in California other than as a Depot employee, and have (a) earned wages at more than one rate during a week when you took paid sick leave, (b) taken paid sick leave at any time during the period September 30, 2020 through July 6, 2022, or (c) taken sick leave at any time during the six month measuring period prior to receiving an Extra Check. As a PAGA Group member, you will receive a payment for the PAGA portion of the Settlement regardless of whether you opt out of the class.

5. How Does the Class Action Settlement Work?

In this Lawsuit, the Plaintiff sued on behalf of herself and all other similarly situated current and former employees. The Class Action Settlement will release all claims by Class Members who do not exclude themselves from the Class by opting out as described below. Class Members who opt out will not receive any payment as a result of the Class Action Settlement. You will automatically receive your share of the Settlement unless you opt out. Your share will automatically be mailed to you after the Court grants final approval of the Settlement at a Final Fairness Hearing. You need to take action only if you do not want to participate in the Settlement (opt out). The procedure for opting out is described in Section 8 below.

Plaintiff and Class Counsel believe the settlement is fair and reasonable. The Court must also review the terms of the Settlement and determine if it is fair and reasonable.

On October 28, 2022, in the Sacramento Superior Court, the presiding judge conditionally certified a class for settlement purposes only and directed that you receive this Notice. The attorneys for the Plaintiff and the Class have copies of all documents related to the Settlement and can provide them to you free of charge upon your request. Documents are also available on the Settlement Administrator’s website, www.CostcoWageAndHourSettlement.com. Contact information for the Plaintiff’s attorneys is provided below.

The Final Fairness Hearing concerning the proposed Settlement will occur on February 10, 2023 at 9:00 a.m., located at 720 9th Street, Sacramento, CA 95814, before Sacramento Superior Court Judge Jill H. Talley.

6. Who Are the Attorneys Representing the Parties?

Attorneys for Plaintiffs and the Class:

COHELAN KHOURY & SINGER

605 C Street, Suite 200,
San Diego, California 92101

Telephone: (619) 595-3001

JGeraci@ckslaw.com

LAW OFFICES OF SAGAH MAJARIAN II

Sahag Majarian

18250 Ventura Blvd

Tarzana, CA 91356

Telephone: (818) 609-0807

sahagii@aol.com

Attorneys for Costco Wholesale Corp.:

SEYFARTH SHAW LLP

David Jacobson

Lauren Schwartz

2029 Century Park East, Suite 3500

Los Angeles, CA 90067

Telephone: (310) 277-7200

djacobson@seyfarth.com

The Court has decided that the attorneys for the Plaintiff are qualified to represent you and all other Class Members simultaneously in this Settlement. You do not need to hire your own attorney because Class Counsel are working on your behalf. But, if you want your own attorney, you may hire one at your own cost.

7. What Are My Options?

DO NOTHING: If you do nothing, you *will* receive payment and you *will* be bound by the release of Class Action claims stated in this Notice and Settlement as stated in Section No. 10 below.

OPT OUT: If you “opt out” in the manner described below, then you will remove yourself from the Class Action. If the Court grants final approval of the Class Action Settlement, then you will *not* receive any payment, except for your share of the PAGA award. This option will retain your right to sue Costco on your own behalf for any of the Class Action claims covered by the Settlement.

OBJECT: If you want to object to any aspect of the proposed Settlement, you can write the Settlement Administrator. If you want to object then you must not opt out.

The procedures for opting out or objecting are set forth below in the sections entitled “How Do I Opt Out or Exclude Myself from the Class Action Settlement” and “How Do I Object to the Class Action Settlement?”

Note: *Costco will not retaliate in any way against you—and is forbidden by law to retaliate in any way against you—for either participating or not participating in this Settlement.*

8. How Do I Opt Out or Exclude Myself from the Class Action Settlement?

If you do not want to take part in the Class Action Settlement, then you must sign and mail a written exclusion request to the Settlement Administrator, Atticus Administration. The request must (1) contain your name, address, telephone number, and the last four digits of your Social Security number, (2) clearly say you do not want to be part of the proposed Settlement, (3) be returned by mail to the Settlement Administrator at the specified address, and (4) be postmarked on or before January 26, 2023.

De Benning v Costco
c/o Atticus Administration
PO Box 64053
Saint Paul, MN 55164

The entry of final judgment, following final approval, will bind all Class Members who do not opt out.

9. How Do I Object to the Class Action Settlement?

If you are a Class Member who does not opt out, then you may object, personally or through an attorney, by writing an objection to the Settlement Administrator and serving it on all counsel listed in Section No. 6 on or before January 26, 2023. The objection must include (a) your full name, address, and telephone number, (b) a written statement of the factual and legal grounds for the objection, (c) copies of any papers, briefs, or other documents on which the objection relies, (d) a list of all persons who will be called to testify in support of the objection, and (e) a list of all cases in which the objector or the objector's counsel has filed objections to a class action settlement in the preceding five years. Class Members who fail to file and serve timely objections run the risk of having waived their right to object (whether through an appeal or otherwise), unless otherwise ordered by the Court.

Nonetheless, Class Members may appear at the Final Fairness Hearing to object orally even if they have not objected in writing.

If the Court rejects the objection, then the objector will receive a Class Action Settlement payment and will be bound by the terms of the Class Action Settlement and Release of Claims by Settlement Class Members as defined in this Notice and in the Settlement.

10. How Does This Settlement Affect My Rights? What are the Released Claims?

If the proposed Settlement is approved by the Court, then a Final Judgment will be entered by the Court. All Class Members who do not opt out of the Settlement will release Costco and the other Released Parties from all claims that were or could have been asserted in this Lawsuit or that were based on or arose out of the facts alleged in this Lawsuit, including, without limitation, claims for (1) failure to pay sick pay (Cal. Lab. Code §§ 245, 246), (2) failure to pay earned wages upon termination (Cal. Lab. Code §§ 201, 202, 203), (3) unfair business practices (Cal. Bus. & Prof. Code § 17200 et seq.), and (4) civil penalties under Labor Code §§ 248.5 and 2698 et seq. for violations of the aforementioned Labor Code provisions. "Released Parties" means Costco and all subsidiaries, parents, affiliates, predecessors, insurers, agents, employees, successors, assigns, officers, officials, directors, attorneys, personal representatives, executors, and shareholders, including their employee benefit plans and their trustees and administrators, agents, employees, and fiduciaries. Entry of judgment after the Court grants final approval of the Settlement will preclude actions by you or those acting on your behalf with respect to any of the causes of action identified above as to any liability of Costco or the Released Parties from September 30, 2017 through July 6, 2022. Entry of judgment will also preclude PAGA civil-penalty actions for alleged violations of any Labor Code section mentioned above from September 30, 2020 through July 6, 2022.

11. What are the Main Terms of the Settlement?

Costco will pay \$9,000,000 in a Gross Settlement Amount. Of that amount, \$300,000 will be allocated to PAGA, and 75% of that payment will go to the California Labor and Workforce Development Agency and 25% will go to PAGA Group members in accordance with their number of attributed pay periods during the PAGA period. From the \$8,700,000 remaining, the following shall be deducted: (1) Class Representative Payment to Rebecca De Benning in an amount up to \$10,000, (2) settlement administration costs for the Settlement Administrator, Atticus Administration, in an amount estimated not to exceed \$128,682, (3) payment of attorneys' fees to Class Counsel in an amount not to exceed \$3,000,000 (one-third of the Gross Settlement Amount), plus litigation costs actually incurred and documented, estimated to be \$20,000. All these deductions are subject to court approval. What then remains of the Gross Settlement Amount will be the Net Settlement Amount that will be distributed to Settlement Class Members. The Settlement Administrator will determine their payments in accordance with their number of attributed closing shifts.

Tax consequences. The overall Net Settlement Amount will be allocated 60% to non-wage payments and 40% for wage statements. You will receive tax documents from the Settlement Administrator.

12. How Much Can I Expect to Receive from this Settlement?

Your payment as a Class Member, which you will receive if you do not opt out, will reflect the number of paid sick leave hours credited to you during the period September 30, 2017 through July 6, 2022. You are credited with 10 additional sick leave hours taken if you are a former employee, to reflect the additional claim available (for untimely termination pay) for a former employee. Based on your credited number of paid sick leave hours taken—<<total_hours>>—your preliminary estimated payment with respect to the Class Action Settlement will be approximately \$<<estimated_payment>>.

If you are a PAGA Group member, then you will receive a payment for your portion of the PAGA settlement regardless of whether you opt out of the class. Your payment as a PAGA Group member is based upon the number of pay periods attributed to you during the period September 30, 2020 through July 6, 2022. Costco's records reflect that you had <<PAGA_periods>> pay periods during the period September 30, 2020 through July 6, 2022.

13. What if I Took More Sick Leave Hours Than Reported in This Notice?

You can dispute the number of sick leave hours taken by mailing a dispute letter to the Settlement Administrator at the address provided in Section 8 by January 26, 2023 and providing credible evidence. The Settlement Administrator will use Costco's records and the information you provide to resolve any disputes about the data appearing in this Notice. The Settlement Administrator's determination will be final and binding, subject to Court review and approval.

14. How Will the Class Representative and Class Counsel be Paid?

The attorneys who represent the Class Representative and the rest of the Class will be paid from the Gross Settlement Fund. Subject to Court approval, Class Counsel may be paid an amount not to exceed one-third of the Gross Settlement Fund (\$3,000,000) in fees plus litigation costs actually incurred, supported by adequate documentation. Costco has paid all of its own attorneys' fees and costs. The Class Representative may also be paid, subject to Court approval, an amount not to exceed \$10,000, as an enhancement for prosecuting this case, undertaking risks for the payment of costs in the event this case had been lost, and a general release of all her claims.

IF YOU NEED MORE INFORMATION OR HAVE ANY QUESTIONS, you may contact Class Counsel listed above, or the Settlement Administrator at the telephone number listed below, toll free. Please refer to the *De Benning v. Costco* Class Action Settlement.

This Notice does not contain all the proposed terms of settlement or all details of court proceedings. If this Notice differs in any way from the Settlement, the Settlement prevails. For more detailed information, you may refer to the underlying documents and papers on file with the Sacramento Superior Court at the address given above, or you may ask for a free copy from Class Counsel. Materials also appear on the Settlement Administrator's website: www.CostcoWageAndHourSettlement.com.

PLEASE DO NOT TELEPHONE THE COURT FOR INFORMATION ABOUT THIS SETTLEMENT.

EXHIBIT B

Atticus Administration, LLC
Chris Longley - CEO

De Benning v. Costco

Prepared for

David D. Jacobson | Senior Counsel
djacobson@seyfarth.com
P: 310.201.1508

Seyfarth Shaw, LLP
2029 Century Park East, Suite 3500
Los Angeles, CA 90067-3021



ATTICUS
SMART | ACCOUNTABLE | BETTER

Class Action Administration

Estimate E2022-04-E12
De Benning v. Costco

Prepared on May 11, 2022
By Chris Longley – CEO | Atticus Administration LLC

Estimate Summary

Atticus Services & Cost Description

NOTICE MAILING-Mailed First Class	\$50,862
<i>Initial Notice (7-pages)</i>	Included
<i>Undeliverable/Return Mail Processing including re-mails</i>	Included
<i>English only</i>	Included
PROJECT MANAGEMENT/ADMIN FEES/Technical	\$11,270
COMMUNICATIONS	\$6,088
<i>PO Box rental</i>	Included
<i>Toll-free number, IVR, live operators, other correspondence</i>	Included
<i>Website (informational only)</i>	Included
<i>Objections, opt-outs, correspondence (written, phone & IVR)</i>	Included
FUND, TAX, EMPLOYMENT REPORTING	\$9,020
<i>Setup QSF, file annual tax and payroll tax returns includes issuing W2's and 1099's</i>	included
DISTRIBUTION	\$51,442
<i>Check printing, payment calculation & verification bank fees, replacement checks</i>	included

TOTAL: **\$128,682**

Key Assumptions

- Class size: **50,000**,
- Notice (English only), 7-pages. Notice sent by mail (1st class USPS).
- Data review, cleansing and preparing file for mailing; including NCOA, and new address searches.
- Communications includes PO box rental, written correspondence, 800# with IVR and live operators (including call-backs).
- Communications includes a case website (informational only).
- California only for employment reporting.
- Awards distributed to all class members.
- Includes W-2's and 1099's along with all employment reporting for one state (CA).
- All class members that do not opt-out to receive a payment and tax documents.

PRINT NAME

ROLE

Client Signature

Date

By signing above, I understand and agree to the pricing terms and services to be provided by Atticus Administration for the stated project.

PLEASE NOTE: This estimate and pricing is for the services stated herein and is valid for 30 days from the date of the estimate. If the Settlement Agreement or other service scope document(s) require additional services not included or priced in this estimate, we will separately price those scope changes and submit an updated quote prior to proceeding with the work.

Payment Terms:

40% payable at Notice

Final 60% payable at Distribution



Detailed Budget

Atticus Services & Cost Description

DESCRIPTION		UNITS	SUBTOTAL
NOTICE MAILING (Data Cleansing & Analysis) Mailed First Class		50,000 Class Mbrs	\$50,862
Class Data List - Cleaning & Processing		24.00 Hrs	\$2,652
Class Notice Review - Proof/Finalize/Print Set-Up		5.00 Hrs	\$553
PRINTING Class Notice 7 pgs: 4 shts doublesided	7	350,000 Printed Pages	\$13,000
Postage Stamp (within 1 ounce max weight)		50,000 ct to mail	\$24,938
Undeliverable/ NCOA /Return Mail Processing & Remail (7%)		3,500 7% of class	\$3,697
Notice Request Re-Mailing		1,500 3% of class	\$6,023
PROJECT MANAGEMENT		95 hrs	\$10,925
TECHNICAL SET UP (includes project kick-off)		3 hrs	\$345
COMMUNICATIONS - English only			\$6,088
Telephone - Set-Up + Monthly Fee		6 Months	\$285
Website (informational only)		6 Months	\$1,500
Telephone - Messages/IVR live operators		6 Months	\$2,091
PO Box - Setup & Monthly Fee		6 Months	\$100
Correspondence - Mail Telephone call backs		various	\$2,113
FUND, TREASURY & TAX Reporting			\$9,020
Set-Up QSF		4.00 Hrs	\$520
Prepare/File Annual Fund Return, Payroll, Unemployment, Wage & Tax Forms		10.00 Hrs	\$1,300
Mail W-2s + 1099's no postage - mailed with check		- postage	\$0
Print W-2s and/or 1099's		50,000 w2's 1099's	\$7,200
DISTRIBUTION, Payment Calculations & Reporting			\$51,442
Cover Letter & Check - Design/Review/Finalize		4.00 Hrs	\$442
Payment Data - Calculate & Verify Payments		30.00 Hrs	\$3,315
Prepare Payment Reports + check reissues		20.00 Hrs	\$2,210
Check - Print Set-up/Printing/Mail Prep + replacements		50,000 checks	\$11,869
Check Mailing Postage (will be 1x mailings)		50,000 mailed	\$24,938
Check - Undeliverable/ NCOA /Return Mail Processing & Remail		2,500 5.0% est	\$6,250
Bank Fees (Account Set-Up & Monthly Fee)		9 months	\$2,418
DATA STORAGE		n/a	\$0
		TOTAL	\$128,682

Operating Assumptions

- Class Size: **50,000 class members.**
- Class members that do not Opt-Out will receive an award payment.
- Class Notice form 7 pages total. Price includes postage and handling fees.
- Data review, cleansing and preparing file for mailing; including NCOA, and new address searches, and skip tracing if required.
- Communications includes PO BOX, Mail Correspondence, 800# toll-free number with live operators and IVR including call-backs,
- Communications includes cataloguing and reporting of objections and any other written correspondence.
- Communications includes a case website (informational only).
- Project management assumes 98 hours at a blended rate of \$115 per hour.
- Qualified Settlement fund assumes 6 months. Price includes positive pay fraud protection and tax reporting both state and federal returns. All bank fees are included in pricing.



Thank you



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